



GGCS Guidance Document 15

Use of Green Gas Certification Scheme within the GHG Protocol

Version 1.5 – September 2022

This note provides information on how a Retirement Statement (also known as a Green Gas Certificate) issued by the Green Gas Certification Scheme (GGCS) relates to the Greenhouse Gas Protocol's (GHGP) reporting guidelines and might be used as part of a company's emissions reporting.

This note has undergone a series of revisions to take into account changes made to the GHG Protocol Scope 2 Guidance in late 2019 and subsequent discussions undertaken since early 2020. This latest version reflects the first publicly available draft of the new guidance which was issued in September 2022. GGCS members trading RGGOs and any End-Use Consumers purchasing RGGOs should be aware of how changes to the GHGP may affect the treatment of a GGCS Retirement Statements as the basis for making claims within an organisation's Scope 1 emission reporting under the GHG Protocol.

1. THE GHG PROTOCOL

The GHG Protocol is the world's most widely used greenhouse gas accounting standard, providing a comprehensive framework to measure and manage greenhouse gas (GHG) emissions from private and public sector operations, value chains and mitigation actions.

Following a 2015 revision to the GHGP guidance, the GGCS commissioned Ecofys¹, a leading sustainability consultancy, to assess the use of GGCS Retirement Statements, evidencing the injection of renewable gas (biomethane) into the UK gas grid, within the GHG Protocol. Ecofys's opinion is summarised below.

“The treatment of biomethane in the GHG Protocol is described in the 2015 GHG Protocol Scope 2 Guidance². Although this guidance primarily focusses on GHG emissions from purchased electricity, a parallel is made with the reporting of Scope 1 emissions from consumed natural gas, including biomethane. If a company purchases biogas or biomethane through a contractual instrument, then the company shall ensure that the instrument meets the Scope 2 Quality Criteria.” Ecofys, 2016

Ecofys's review of the GHG Scope 2 Quality Criteria confirmed that the GGCS's contractual instrument for biomethane – a Retirement Statement listing retired Renewable Gas Guarantees of Origin (RGGOs) – complies with the Scope 2 Quality Criteria (the details of which are set out in table in Appendix 2 of this document).

Following further consultation by the GGCS with the UK GHG auditing sector, the use of GGCS Retirement Statements to conduct market based Scope 1 emissions reporting, linked to the use of biomethane, has become increasingly common over the last few years.

It should be emphasised that the validity of GGCS Retirement Statements for market based emissions reporting has always been decided by a relevant GHG auditor and not by the GGCS.

2. TIMELINE AND SUMMARY OF CHANGES

The treatment of biomethane in the GHG Protocol was first set out in the 2015 GHG Protocol Scope 2 Guidance³ - the relevant paragraphs are set out in Appendix 1 of this document. Although this guidance primarily focuses on GHG emissions from purchased electricity, a parallel is made with the reporting of Scope 1 (direct) emissions from consumed natural gas, including biomethane.

The Guidance set out that if a company purchases biogas or biomethane through a contractual instrument, and **if the company can ensure that the instrument meets the GHG Protocol Scope 2 Quality Criteria**, it can then report Scope 1 emissions for biomethane using the market-based method and using a specific (and often lower) emission factor.

As detailed above and in Appendix 2 of this document, a review undertaken by Ecofys confirmed that the GGCS's contractual instrument for biomethane – being a Retirement Statement – complies with the Scope 2 Quality Criteria.

Ecofys also confirmed that:

¹ Ecofys were subsequently merged into the consultancy Guidehouse

² GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard (January 2015)

³ GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard (January 2015) Standard (January 2015)

- Direct Scope 1 CO₂ emissions linked to the use of biomethane are zero
- Direct emissions from other GHGs (CH₄ and N₂O) still need to be reported as part of a Scope 1 account.
- Upstream emissions of green gas production and transport are reported as part of Scope 3 emissions and this data needs to be included on the certificate provided by the certification scheme.⁴
- Biogenic emissions need to be reported, but separately from the scopes in a memo item.

3. **CHANGES TO THE 2015 GHG PROTOCOL SCOPE 2 GUIDANCE**

The GGCS was alerted in December 2019 that the relevant paragraphs relating to biomethane were no longer in the 2015 GHG Protocol guidance document (Appendix 1 was still included in the document but the relevant paragraphs concerning ‘Scope 1 emissions from purchased and consumed gas’ were no longer present).

Subsequent enquiries by the GGCS to the World Resources Institute (WRI) – who lead on the production of the GHG Protocol - discovered the following:

- The biomethane paragraphs in the ‘2015 GHG Protocol Scope 2 Guidance’ document were removed around October 2019. No alert was made to users that this change had been made.
- A ‘List of Corrections to Scope 2 Guidance’ note was posted online in March 2020 and can be viewed [here](#)
- The WRI’s reason for the removal of these paragraphs – as set out in their note – is as follows:
- “The Scope 2 Guidance addresses scope 2 accounting only. It is not intended to amend scope 1 accounting as defined in the GHG Protocol Corporate Standard. Forthcoming GHG Protocol guidance on bioenergy will provide guidance on the use of bioenergy certificates.”
- The note goes on to say that “Forthcoming GHG Protocol guidance on bioenergy will provide guidance on the use of bioenergy certificates.”

4. **NEW WRI GUIDANCE AND TECHNICAL WORK GROUPS**

This new guidance referred to a work programme called ‘New Greenhouse Gas Protocol Standards/Guidance on Carbon Removals and Land Use’ initiated in early 2020 and set out in the following WRI blog post [here](#).

⁴ A full copy of the Ecofys study can be requested by emailing: info@greengas.org.uk

This new guidance is intended to provide information to how companies can account for and report the following activities in their greenhouse gas inventories:

- Land use
- Land use change
- Carbon removals and storage
- Bioenergy and other biogenic products

The WRI state this new guidance will be:

- Designed to create more consistency and transparency in the way companies quantify and report GHG emissions and removals from land use, land use change, bioenergy and carbon removal technologies and track progress toward GHG mitigation goals, following a credible approach.
- Developed through an inclusive, multi-stakeholder process and will build on existing methods and approaches.
- Is likely to be adopted by key programmes and initiatives such as the Science Based Targets Initiative (SBTi).

The project is ambitious in terms of the numbers of areas to be reviewed. The process involved a total of three Technical Working Groups (TWG) - the Carbon Removals TWG, the Land Sector TWG and Bioenergy TWG, while an additional Advisory Committee reviews the outputs of the TWGs.

5. **CONSIDERATION OF GREEN GAS CERTIFICATES (RGGS)**

Included in the WRI's project overview document⁵, which sets out the scope of the programme were a number of items relevant to green gas certificates including the:

- Relationship of corporate land sector accounting to other programs and initiatives;
- Sustainability certification (i.e. sustainable agriculture, green gas certificates, apparel and forestry standards)"
- Reporting;
 - Reporting emissions and removals across scopes (i.e., scope 1, 2 and 3)
- Separate or combined reporting of fossil versus biogenic carbon
- Whether and how to report avoided emissions (e.g., in a bioenergy life cycle)
- How to report purchases or sales of credits/certificates

⁵ Land Sector and Removals Initiative Project Overview Updated November 2020 - <https://ghgprotocol.org/blog/update-greenhouse-gas-protocol-carbon-removals-and-land-sector-initiative>

The WRI invited the GGCS's participation, as a representative of ERGaR⁶, in the GHG Protocol Bioenergy Technical Working Group (TWG). A total of five meetings of this Bioenergy TWG took place during 2020, the last in October 2020, with a further meeting of all three of the TWGs in early 2021. The Bioenergy TWG has a broad range of members, from environmental NGOs, large corporates, academics with a background in land use issues and climate change, GHG auditors and so on (see pp 9,10,11 of project overview document, referenced above, for the full list of participants). The range of issues brought to meetings has highlighted the complexities of GHG accounting for land use emissions/bioenergy which in turn has led to an extension in the timetable for the production of the new guidance, which had was originally scheduled to be finalised in Q4 2021.

The delay in the process of producing the revised guidance led to a number of subjects originally included in the 'Draft List of Topics to Address' (see Project Overview document) to be left out of discussions, including the issue of "sustainability certification" and a review on the use of green gas certificates.

The final draft GHG Protocol Land Sector and Removals Guidance was published online on 12 September 2022. The document sets out how companies should account for and report GHG emissions and removals from land management, land use change, biogenic products, carbon dioxide removal technologies, and related activities in GHG inventories, building on the GHG Protocol's Corporate Standard and Scope 3 Standard.

Also published was a Draft Pilot Testing and Review document. The pilot testing phase will last 4 months (September 15, 2022 - January 15, 2023) and the review phase will last two months (September 28 - November 30, 2022). The Review Group is open to any interested stakeholder that wants to participate in the public consultation by reviewing this draft (to sign up, click here). Members of the Pilot Testing Group and Review Group will receive the draft by email when each phase begins.

Following the pilot testing and review phase, the Guidance will be finalized in consultation with the Advisory Committee and Technical Working Group and published in 2023.

6. DRAFT GUIDANCE DOCUMENT AND TREATMENT OF GREEN GAS CERTIFICATES

In this September 2022 draft, Green Gas Certificates are referenced in a separate Annex B on Biomethane in the Part 2 document of the Land Sector and Removals Guidance 'Calculation Guidance'. Following consideration of the process for accounting for the direct combustion of biomethane, there is section on '*Accounting for pipeline-delivered gas*' which looks at 'common carrier pipelines' which "*can contain a mix of biogenic and fossil gas and do not differentiate or track unique molecules of gas from the point of injection to the point of consumption*", where the guidance suggests that "*companies should use grid-averages, where they exist, to determine the percentage of fossil and biogenic natural gas delivered into the pipeline*".

⁶ ERGaR is the European Renewable Gas Registry – which the GGCS is its UK member. Further information can be found here <http://www.ergar.org/>

The guidance goes on to say that *“Biomethane certificates or credits cannot be used to adjust scope 1 emissions resulting from the combustion of gas (in company owned/controlled sources) delivered via a common carrier pipeline”* but then continues that *“Companies may report purchases of certificates or credits separately from the scopes in a GHG inventory report”* [page 130].

7. DRAFT GUIDANCE DOCUMENT AND TREATMENT OF NEGATIVE CO2 CREDITS

Within the GHG calculation methodology of the Non-domestic Renewable Heat Incentive (NDRHI), the Green Gas Support Scheme (GGSS) and the Renewable Transport Fuel Obligation (RTFO) negative CO2 values can be included.

- NDRHI, GGSS and RTFO allow negative values when capturing CO2 and taking it off site e.g. for use in food and drink manufacturing. No long-term storage is required.
- The GGSS and RTFO allow negative CO2 values when using manure as a feedstock.

However, the GHG Protocol uses an “inventory” approach to GHG calculations which does not allow for “counterfactual” CO2 savings, such as the assumption that manure used in a biomethane production process would of otherwise been left in the open and led to methane emissions.

The draft Land Sector and Removals guidance requires that any CO2 savings from capture and storage of CO2 can only be reported if the CO2 continues to be stored and removed from the atmosphere. While there are plans for some biomethane sites to send CO2 to long term storage current uses are in food and drink manufacturing and would result in a GHG savings according to the draft guidance

8. 2023 REVIEW OF MARKET BASED ACCOUNTING

During the working group discussions in 2022, the WRI GHG Protocol team announced that a review of market based accounting is going to take place in 2023. The Protocol allows for market based accounting as a tool to convey claims and influence market dynamics by allowing the expression and aggregation of consumer preferences for specific low-carbon energy products, which would not otherwise be possible. Consumers cannot choose what energy is generated on their grid at a given point in time, but contractual instruments allow for energy attributes such as GHG emissions to be allocated along the lines of contractual relationships among producers, suppliers, and consumers.

Annex B also includes new information (as compared to an earlier working group draft version of this document) on a future review of market based accounting highlighting that the *“market-based method, which reflects emissions from electricity that companies have purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled with attributes about the energy generation, or for unbundled attribute claims.”* This market based route (which originally only considered electricity) is the same that was employed for the use of grid (pipeline) based biomethane and green gas certificates (see reference to Ecofys report earlier on in this paper). The GHG Protocol Team address this issue stating that *“Additional market-based accounting approaches have been proposed for a variety of other commodities, markets, and end-uses since the introduction of the Scope 2 Guidance”* and in response to these new

additional approaches that have come forward over the past few years the GHG Protocol team will now bring forward a “process ...to explore both whether market-based accounting is appropriate within scope 1 and/or scope 3 and also whether the accounting approach for scope 2 (e.g., dual reporting using location-based and market-based methods, market instrument quality criteria, etc.) would need to be applied, amended, or expanded if applied outside of scope 2. The process to develop new guidance will begin in 2023.”

Importantly the note concludes that based “on the final outputs of this process, the contents of this annex [on biomethane] may be amended.”

9. IMPACTS OF CHANGES TO THE 2015 GHG PROTOCOL GUIDANCE

The changes since 2020 to the GHG Protocol guidance on emissions reporting using biomethane via ‘contractual instruments’, has created uncertainty for GHG auditor community, who have developed expertise on the use of green gas certificates over the past few years⁷.

The GGCS has been in contact with a number of GHG auditors (as well as the CDP) alerting them to the removal of the relevant biomethane paragraphs from the GHG Protocol guidance. Feedback has been that companies continue to purchase Renewable Gas Guarantees of Origin (RGGOs) as part of their emission reduction plans, including companies who have set targets under the SBTi. For example a major auditing company, EY, have recently reported their use of green gas certificates as part of their own emissions reduction plan⁸.

We also note that the latest version of the CDP’s Scope 2 guidance (dated April 2021) – available here⁹ – has revised its text on the use of green gas certificates – but continues to state that “green gas certificates [used by] the end-user can claim a zero-emission rate” [p26] providing certain criteria are met (which are set out in the section).

The GGCS will continue to monitor this situation and welcomes any feedback from members on how these changes are affecting the ability of consumers to report green gas use.

⁷ For example, see South Poles factsheet on green gas certificates - https://www.greengas.org.uk/images/upload/news_51_South-Pole-Group-Green-Gas-Factsheet.pdf and Natural Capital Partners https://assets.naturalcapitalpartners.com/downloads/Green_Gas_Certificate_Factsheet.pdf and the Carbon Neutral Standard <https://www.carbonneutral.com/the-carbonneutral-protocol/technical-specifications-and-guidance/step-2-measure-1/additional-requirements-2-1-1-1> and ECOHZ <https://www.ecohz.com/climate-solutions/green-gas-certificates/> and 3degrees <https://3degreesinc.com/resources/renewable-natural-gas/>

⁸ For example EY https://www.ey.com/en_uk/corporate-responsibility/ghg-emissions-overview

⁹ CDP Technical Note: Accounting of Scope 2 emissions, CDP, April 2021

10. KEY POINTS

GGCS members and green gas consumers should be aware that September 2022 draft “Land Sector and Removals” guidance does not provide a route for market-based reporting of Scope 1 emissions, using GGCS Retirement Statements, but allows companies to report purchases of green gas certificates separately from the scopes in a GHG inventory report.

However organisations currently compiling a GHG report based on the GHG Protocol should not at this stage refer to the draft guidance “which is not yet final and does not represent official Greenhouse Gas Protocol guidance”¹⁰.

The September 2022 draft is for the purposes of pilot testing with the Pilot Testing Group and review by a Review Group. The Review Group is open to any interested stakeholder that wants to participate in the public consultation by reviewing the draft. The pilot testing phase will last four months (September 15, 2022 - January 15, 2023) and the review phase will last two months. Further information in on the GHG Protocol website [here](#).

As previously mentioned all decisions related to the validity of market based Scope 1 emissions claims are subject to the decision of any auditors involved and the rules of any reporting/disclosure scheme involved in e.g. CDP or SBTi. We advise consumers to engage with relevant auditors and advisors to understand their particular circumstances and continue to check for updates provided by the GGCS and the WRI.

Slides and a recording of a webinar covering the events leading up to the publication of the draft “Land Sector and Removals” guidance are available [here](#).

¹⁰ Greenhouse Gas Protocol *Land Sector and Removals Guidance* (Draft for Pilot Testing and Review, September 2022).

11. APPENDIX 1

- (i) GHG Protocol Scope 2 Guidance
- (ii) An amendment to the GHG Protocol Corporate Standard (January 2015)
- (iii) Appendix A Accounting for Steam, Heat, and Cooling (pp 94,95)

Scope 1 emissions from purchased and consumed gas.

Like electricity, gas may be transmitted and distributed through a shared pipeline. Wherever it is used—either combusted in a boiler/heater or used as an input in a fuel cell—the emissions released from its consumption become the scope 1 emissions of the owner/operator of the equipment. Gas grids are regulated and managed closely by contracts between generators, suppliers, and consumers. In the U.S., the Federal Energy Regulatory Commission (FERC) also supports this by legally requiring contracts for a specific gas source to be treated equivalently to a “direct delivery line” between that source and the ultimate consumer.²

Almost all gas used today is natural gas with a standard emission factor, but increasingly biogas from landfills or other waste facilities is being injected into gas grids.

If a company has a contractual instrument specifying its gas supply as “biogas” or “biogenic,” the company should report using the market-based method and refer to the Scope 2 Quality Criteria to evaluate whether its gas use should be reported as scope 1 natural gas using a standard emission factor, or as biogenic CO₂ emissions reported separately from the scopes. This evaluation requires some interpretation, since the Scope 2 Quality Criteria are specific to electricity and their guidance must be translated for use with gas. For instance, criterion 1 in relation to GHG emission rate claims should be also interpreted to include the emission rate specific to the biogenic fuel origin. The CO₂ emissions will be influenced by the heat rate / efficiency of the equipment used to consume the gas.

Companies would not need to provide a “dual report” in scope 1 based on average gas fuel blends in their region (location-based), due to: the limited types of fuel input (natural gas or biogas); the prevalence and regulatory support of contractual purchasing; and the less-complex dynamics of pipeline infrastructure, which does not present the same complexity of electricity infrastructure (e.g., no need to balance supply and demand throughout the day)

12. PPENDIX 2 – ECOFYS’S ASSESSMENT OF THE GHGP SCOPE TO QUALITY CRITERIA AGAINST GGCS RGGOS AND RETIREMENT STATEMENTS

The full Ecofys study can be obtained by emailing info@greengas.org.uk

	GHG Protocol Quality Criteria requirement for contractual instruments for electricity ¹¹	Ecofys opinion on the applicability for the contractual instrument for biomethane	GGCS Note
	Convey the direct GHG emission rate attribute (claim) associated with the unit of electricity produced.	Instruments should “convey the GHG emission rate attribute specific to the biogenic fuel origin”.	Following Ecofys’s recommendation that an emission rate be introduced, the GGCS included this on all Retirement Statements. GGCS Retirement Statements listing RGGOs for gas injected in the UK, are related to biomethane supported by the UK Government’s Renewable Heat Incentive (RHI), and display the emission limit set by the RHI sustainability criteria¹². Further information may be available from biomethane producers who may calculate specific emission rates for individual consignments of biomethane. RGGOs imported from other registries may not include emission information.
	Be the only instruments that carry the GHG emission rate attribute claim associated with that quantity of electricity generation.	Companies must be able to make unique claims and no double counting can therefore occur where the attributes of the same amount of biomethane are sold to other companies or persons.	<i>Ecofys stated that no action was required as the GGCS already met this requirement.</i> The GGCS has processes in place to guard against double registration or double sale of certificates and is external audited on an annual basis to confirm that no double counting has occurred.

¹¹ Table 7.1 Scope 2 Quality Criteria, GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard (January 2015)

¹² The Regulations require that participants must produce renewable heat with lifecycle greenhouse gas emissions of less than or equal to 34.8 grams of carbon dioxide equivalent per megajoule of heat generated, or, if they are injecting biomethane instead of producing heat, the biomethane must have lifecycle greenhouse gas emissions of less than or equal to 34.8 grams of carbon dioxide equivalent per megajoule of biomethane (measured as the net calorific value). Non Domestic RHI Sustainability Self Reporting Guidance (version 2), Ofgem, 23 May 2018

	Be tracked and redeemed, retired, or cancelled by or on behalf of the reporting entity.	Companies must be able to make unique claims and no double counting can therefore occur where the attributes of the same amount of biomethane are sold to other companies or persons.	Ecofys stated that no action was required as the GGCS already met this requirement. The GGCS has processes in place to guard against double registration or double sale and is external audited on an annual basis to confirm that no double counting has occurred.
	Be issued and redeemed as close as possible to the period of energy consumption to which the instrument is applied.	The Certificate should include the “vintage” or the date of biomethane generation from which the contractual instrument is derived. The GHG Protocol is not explicit about the definition of “close” but mentions “<i>timing should be consistent with existing standards for the market where the contractual instruments exist</i>”. In our opinion it is acceptable We note, however, that RGGOs in the GGCS have a validity of up to 3 years and 3 months. Furthermore, according to the RED REGOs shall take place within 12 months of production of the corresponding energy unit.	Ecofys stated that no action was required as the GGCS already met this requirement. Ecofys recommended that in terms of timing and the use of the word ‘close’, it is acceptable for RGGOs to represent biomethane injected produced during the current, or previous reporting year. Each GGCS Retirement Statement clearly lists the RGGOs retired and the period of the biomethane production to which they relate, which allows the purchaser of a RGGOs to meet this requirement should they deem it necessary The three year, three month RGGO validity within the GGCS creates the possibility that production and redemption will not be ‘close’ according to this definition. This caters for gas consumers who do not use the GHG Protocol or interpret this requirement differently.
	Be sourced from the same market in which the reporting entity’s electricity-consuming operations are located and to which the instrument is applied.	That the certificate includes information on the location of origin of the biomethane. Boundaries established by regulatory authorities and/or certification/issuing bodies should be used and there should be reasonable links between the production and consumption points. In our view biomethane from projects in the UK can be sold at least across to users across the UK and possibly across the EU, but not internationally.	Ecofys stated that no action was required as the GGCS already met this requirement. Ecofys’s opinion was that biomethane from projects in the UK can be sold to users across the UK and possibly across the EU, but not internationally. GGCS Retirement Statements clearly state the location of the biomethane production. It is established market practice for non-UK gas consumers is to use RGGOs based on UK green gas production. It is also reasonable that UK consumers could use RGGOs based on European gas production, although the relative price and availability of non-UK RGGOs has limited this type of use to date. The International Energy Agency’s (IEA) Gas Trade Flows Data set provides detailed information on physical interconnection within the European gas grid. Consumers outside of the UK may wish to consult with any disclosure or reporting mechanisms they participate in and/or any auditor of their Scope 1 emission claims in order to satisfy themselves that this criteria is met.
	Utility-specific emission factors shall be calculated based on delivered electricity,	Ecofys’s view was that this requirement was not relevant for biomethane.	Ecofys stated that no action was required by the GGCS

	incorporating certificates sourced and retired on behalf of its customers. Electricity from renewable facilities for which the attributes have been sold off (via contracts or certificates) shall be characterized as having the GHG attributes of the residual mix in the utility or supplier-specific emission factor.		GGCS assumes that customers using the GHG Protocol will make direct purchases of RGGOs, rather than be supplied via a green gas tariff. Therefore utility specific emission factors will not be relevant. Any company on a green gas tariff wishing to use a utility specific emission factor should discuss with their gas supplier how the calculation of a given emission factor will meet this criteria.
	Companies purchasing electricity directly from generators or consuming on-site generation shall: Ensure all contractual instruments conveying emissions claims be transferred to the reporting entity only. No other instruments that convey this claim to another end user shall be issued for the contracted electricity. The electricity from the facility shall not carry the GHG emission rate claim for use by a utility, for example, for the purpose of delivery and use claims.	Ecofys's view was that this requirement was not relevant for biomethane.	Ecofys stated that no action was required as the GGCS Any company purchasing green gas directly from onsite generation should ensure they meet this criteria.
	Finally, to use any contractual instrument in the market-based method requires that an adjusted, residual mix characterizing the GHG intensity of unclaimed or publicly shared electricity shall be made available for consumer scope 2 calculations, or its absence shall be disclosed by the reporting entity.	The opinion of Ecofys was that this requirement was not currently relevant as the percentage of biomethane in the gas grid is negligible. But should the percentage increase to the extent that this has an impact on gas grid emission factor then this should be revisited.	Ecofys stated that no action was required as the GGCS At the time of the study (2015) biomethane represented less than 0.2% of total UK gas consumption and in 2019 it was still less than 1% (approx. 5 TWh of 878 TWh of consumption (DUKES, 2020) The Government's Digest of UK Energy Statistics (DUKES) has measured the quantity of biomethane produced for the first time in 2017, in their renewable energy statistics. In 2020 BEIS included the impact of biomethane injection in the emission factors they publish. Consumers should consult with relevant consultants and auditors on how these factors should be applied.