Scheme Rules (Version 45)

All changes being proposed to the Scheme Rules are shown as tracked changes below. Comments are shown to the right to explain the reasons for the proposed changes.

The existing Scheme Rules enable REAL (the Scheme Administrator) may update these rules from time to time after consultation with the Oversight Panel (being all GGCS members). No vote is taken.

The Consultation is being conducted by way of circulation of this document to all GGCS members and a discussion at our Oversight Panel on Nov 18th 2026. GGCS members may also submit comments to info@greengas.org.uk any time before Nov 27th 2026.

We will then communicate with all members before the end of the year to confirm the rules that will go into force on Jan 4th 2027.

This document sets out the Scheme Rules for participating in the Green Gas Certification Scheme (the Scheme).

These Rules are effective from January 4th 2027 ~~Tuesday 2 July 2024~~, replacing:

- Version 4 of the Scheme Rules in force between Monday 1 July 2024 and January 3rd 2027
- Version 3 of the Scheme Rules in force between Friday 1 May 2020 and Monday 1 July 2024 (download here).
- Version 2 of the Scheme Rules in force between June 2018 and Thursday 30 April 2020 (download here).
- Version 1 of the Scheme Rules in force between 2011 and May 2018 (download here).

1. Introduction

1.1. The Scheme is administered by Renewable Energy Assurance Limited (REAL), a wholly owned subsidiary of The Association for Renewable Energy and Clean Technology (REA).

1.2. This document describes the respective roles of Scheme Participants and the Scheme Administrator within the Scheme, as well as the processes by which the Scheme operates.

1.3. Definitions of key terms can be found in the Appendix of this document.

2. Object and benefit of the Scheme

2.1. The objects of the Scheme are to track Green Gas, as defined in Rule 3, from Gas Producer to End-Use Consumer by:

2.1.1. issuing one Renewable Gas Guarantee of Origin (RGGO) for each kWh or MWh of Green Gas injected into a Distribution Network; and

2.1.2. providing a secure platform for the transfer and Cancellation of RGGOs.

2.2. The Scheme does not track physical flows of Green Gas.

2.3. Each unit of Green Gas injected into a Distribution Network displaces a unit of high carbon gas, providing savings in greenhouse gas (GHG) emissions.

2.4. The Scheme is a reliable means of ensuring that there is no double-counting or double-selling of Green Gas. It promotes confidence in the renewable energy sector and encourages additional Green Gas production.

2.5. The Scheme is primarily a system for tracking Green Gas that is produced within the United Kingdom. However, the Scheme cooperates with other European Green Gas registries regarding the ~~import~~Import and ~~export~~Export of RGGOs and Energy Attribute Certificates (EACs), and may operate in other jurisdictions where such operations are to the benefit of the Scheme and support greater amounts of Green Gas to be produced and consumed.

Commented [JS1]: Now defined terms

3. Defining Green Gas

3.1. The Scheme only issues RGGOs for products it considers to be Green Gas according to the criteria set in its Scheme Rules.

3.2. A Green Gas must either be:

3.2.1. a gas produced from a renewable source, where the GHG emissions from its production and consumption are calculated according to a recognised methodology and are within a recognised threshold (see 3.5 and 3.7) representing a GHG saving in comparison to the production and consumption of equivalent fossil products; or

3.2.2. a gas from a non-renewable source, where the GHG emissions from its production and consumption are calculated according to a recognised methodology and are within a recognised threshold (see 3.5 and 3.7) representing a GHG saving in comparison to the production and consumption of equivalent higher carbon fossil products, or a saving against the GHG emissions related to the alternative disposal of the materials used to generate such a gas.

3.3. Green Gas must meet the quality requirements of the Distribution Network into which it is being injected. For injection into the Gas Distribution Network (GDN) and National Transmission System (NTS), these requirements are set out in the Gas Safety (Management) Regulations 1996.

3.4. Subject to complying with the criteria in these rules, examples of Green Gas include, but are not limited to:

3.4.1. methane produced from renewable materials through a biological, chemical, or physical process. This may include biomethane from anaerobic digestion and Biogenic Synthetic Natural Gas (Bio-SNG) from gasification or pyrolysis.

3.4.2. propane produced from renewable materials through a biological, chemical, or physical process.

3.4.3. hydrogen produced from the electrolysis of water using renewable energy. Such hydrogen may be combined with carbon dioxide to create methane.

3.4.4. hydrogen produced from a fossil source, that results in lower GHG emissions from its production and consumption in comparison to the fossil gas that it replaces, because carbon was captured during the production process and placed into long term storage therefore not entering the atmospheric carbon pool.

~~3.4.4.~~3.4.5. carbon dioxide produced from renewable materials through a biological, chemical or physical process.

Commented [JS2]: Makes clear we are open to issuing RGGOs for biogenic CO2.

3.5. For RGGOs issued for gas produced by GGCS Scheme Participants, the GHG emissions that arise from the production and consumption of a gas must be assessed by a qualified independent expert against recognised standards such as those noted in 3.7.

3.6. Where GGCS accepts transfers of EACs from other registries e.g. via the ERGaR CoO Scheme, then we will seek assurances from the relevant parties that the gas those EAC represent and for which we will issue RGGOs, has met our definition of a Green Gas. However, GHG calculations related to its production may not have been conducted or may not be available to the Scheme.

3.7. The extent to which the production and consumption of a gas represents a GHG saving in comparison to the production and consumption of an equivalent higher carbon product, and can therefore be considered a Green Gas according to these rules, will be determined with reference to the thresholds published in established methodologies and classifications for renewable and low carbon gases, including:

3.7.1. the Directives of the European Parliament and Council; and

3.7.2. sustainability criteria within UK government support mechanisms such as:

3.7.2.1. the Non-Domestic Renewable Heat Incentive (NDRHI);

3.7.2.2. the Green Gas Support Scheme (GGSS);

3.7.2.3. the Renewable Transport Fuel Obligation (RTFO); and

3.7.2.4. the Low Carbon Hydrogen Standard (LCHS).

3.8. The Registration Database provides for RGGOs representing different types of Green Gas to be issued, traded, and cancelled in distinct areas within the database. All RGGOs are clearly labelled to indicate the type of Green Gas they relate to.

4. Government support for Green Gas

4.1. The Scheme pays due regard to any support mechanisms, subsidies, and the tax treatment provided by the UK Government for the production or consumption of Green Gas. Where such information is available at the point of issuing, RGGOs and Cancellation Statements include relevant information on such support mechanisms, subsidies, and tax treatments.

4.2. The Scheme seeks to align itself with the processes of the schemes mentioned in 3.7, where such alignment creates reporting and compliance efficiencies for Scheme Participants and provides additional assurances for End-Use Consumers.

4.3. Where the Scheme operates in, or is involved with, jurisdictions outside the UK, the Scheme may have regard to regulatory regimes and support mechanisms that operate in those jurisdictions.

4.4. RGGOs issued by the GGCS or ~~import~~Imported from other biomethane registries do not count towards the UK's share of energy from renewable sources in its gross final consumption, as historically calculated under Article 3 of the European Union's Renewable Energy Directive, nor do they count within the UK's current methodology for calculating its territorial emissions.

Commented [JS3]: Now a defined term

4.5. RGGOs ~~export~~Exported to other registries and/or allocated to consumers outside the UK, do not count towards any other countries share of energy from renewable sources in its gross final consumption, under Article 3 of the European Union's Renewable Energy Directive, or any other equivalent target.

Commented [JS4]: Now a defined term

5. Start date for the Scheme

5.1. The Scheme began operation in March 2011. Its founder partners were British Gas, E.ON, Thames Water, National Grid, Bio Group, Milton Keynes Council, and CNG Services Ltd.

6. Taking part in the Scheme

6.1. Participation in the Scheme is voluntary and is open to businesses involved in producing Green Gas, and businesses wishing to own and transfer RGGOs and cancel them on behalf of End-Use Consumers. This may include the End-use Consumers themselves.

6.2. Participants must:

6.2.1. complete a registration form provided by the Scheme;

6.2.2. agree to abide by the Scheme Rules; and

6.2.3. sign a letter agreement with the Scheme Administrator.

6.3. The Scheme Administrator implements a 'know your customer' process in order to satisfy itself that applicants to become Scheme Participants will act with integrity, comply with the Scheme Rules and the law of the domain in which they operate.

6.4. Other organisations with an interest in Green Gas may wish to join the Scheme as Associate Members and must also meet the criteria in 6.2.

6.5. Should the letter agreement between a Scheme Administrator and a Scheme Participant terminate for any reason, then that Scheme Participant will immediately cease to:

6.5.1. Have access to its account in the Registration Database;

6.5.2. describe itself as being a member of, or participant in, the Scheme; or

6.5.3. use the GGCS's logo.

6.6. Where an organisation's participation in the Scheme is terminated they ~~Scheme~~ will retain ownership of RGGOs in their Producer or Trader Account and the Scheme Administrator will dispose of them in line with the provisions of the Scheme Rules, on instruction from the Scheme Participant whose participation has been terminated. If those organisations are in administration the Scheme will work with the administrator to dispose of the RGGOs. Scheme Fees may be payable in advance of any Cancellations carried out by the Scheme Administrator on instruction from a terminated Scheme Participant.

Commented [JS5]: Clarification of intention that the Scheme Participant retains ownership of RGGOs

6.7. It is the responsibility of Scheme Participants to account for the possibility that their counterparties may end their participation in the Scheme.

7. Scheme Administrator

7.1. The Scheme Administrator is responsible for the day-to-day running of the Scheme.

7.2. The Scheme Administrator uses reasonable endeavours to appoint a third party to supply, manage and maintain the Registration Database to a reasonable standard.

7.3. The Scheme Administrator will use reasonable endeavours to procure that the third party appointed under clause 3.1 will create, and provide Scheme Participants with access to, their Producer and Trader Accounts.

7.4. Where deemed necessary the Scheme Administrator may temporarily withhold access to Producer and Trader accounts, for example where it is investigating instances of suspected fraud or errors with Production Declarations or there is uncertainty on who has the authority to access those accounts.

7.5. The Scheme Administrator designs, implements, and administers an audit programme to give comfort to Scheme Participants and End-Use Consumers in the integrity of the Scheme. It reports to a Compliance Committee and the Oversight Panel, relevant details of the outcome of this audit program.

7.6. The audit program includes checks on both the production of Green Gases and checks on the Scheme's own processes for the issuing, transfer, and cancellation of RGGOs.

7.7. To enable these audits Scheme Participants must respond to reasonable requests for records relating to participation in the Scheme and deliver such records to the Scheme Administrator, or any person appointed by the Scheme Administrator to monitor compliance with the Scheme.

8. Gas Producers

8.1. In order to be issued with RGGOs participating Gas Producers are required to make Production Declarations regarding the amount of Green Gas they have injected into a Distribution Network, in accordance with Guidance Documents issued by the Scheme Administrator. Gas Producers may inject gas which is wholly Green Gas, or they may inject a mixture of fossil gas and Green Gas. Only the Green Gas portion of a mixed gas injection is issued with RGGOs.

8.2. Production Declarations must provide evidence to show that Green Gas injected into a Distribution Network for which the issue of RGGOs is being requested, complies with the criteria in Rule 3.

8.3. Producers are responsible for the accuracy of all Production Declarations and the Scheme Administrator shall be under no obligation to consider or review the accuracy or completeness of any such declaration.

8.4. Where there is an amount of Green Gas recorded in a Production Declaration for which NDRHI or GGSS support has not been claimed, supporting evidence of the Green Gas

production should be based on a robust methodology that meets a recognised standard, such as the GGCS Data Verification Statement process, ISAE 3000, or a Voluntary Scheme recognised by the European Commission.

8.5. For each ~~kWh~~ unit of Green Gas injected into a Distribution Network the Scheme will issue the relevant number of RGGOs (being in units of kWh, ~~or~~ MWh, KG or any other unit as described in a relevant Guidance Document), subject to any corrections including, but not limited to, subtracting any units of fossil gas, and electricity from fossil-based generation, used in the production process. When subtractions are made from the total production for the use of fossil derived energy (gas or electricity) ~~from total production~~ this is referred to as the Net or Nett method and this information is recorded in the relevant RGGOs.

8.6. If the RGGOs are issued based on the amount of kWh injected into a Distribution Network without any subtraction for fossil gas or electricity from fossil-based generation, used in the production process, this is generally referred to as the gross measurement, and this information will be recorded in the relevant RGGOs.

8.7. Gas Producers have the ability to receive into their Producer Accounts RGGOs offered to them by other Gas Producers, other Account Holders and (where defined in the Scheme's Guidance Documents regarding Imports) accounts in other registries.

8.8. Gas Producers may initiate Transfer Requests by logging into their Producer Accounts and following the processes defined in the Scheme's Guidance Documents.

8.9. Gas Producers may initiate Cancellation Requests by logging into their Trader Accounts and following the processes defined in the Scheme's Guidance Documents

~~8.7.~~ Gas Producers may initiate Exports by logging into their Trader Accounts and following the processes described in the Scheme's Guidance Documents ~~Gas Producers may initiate Transfer Requests by logging into their Producer Accounts to enter the required information.~~

~~8.8. According to the functionality of the Registration Database in use at the time, Gas Producers may:~~

~~8.8.1. receive into their account RGGOs from other Gas Producers and Account Holders; and~~

~~8.8.2. initiate Cancellation Requests which allocate RGGOs to End-Use Consumers.~~

~~8.9.~~8.10. Gas Producers shall not register the same units of Green Gas registered under the Scheme in accordance with clause 4.5 in any other scheme which has the aim of representing the environmental attributes of that Green Gas within an EAC and transferring that value to intermediaries, Gas Suppliers, and End-use Consumers save in respect of any exemptions that the Scheme Administrator may publish in these Scheme Rules (see 8.10) or the relevant Guidance Documents from time to time.

Commented [JS6]: To account for potential to issue RGGOs for biogenicCO2

Commented [JS7]: Aligns description of RGGO transfers, cancellations and exports with Account Holders (Traders)

~~8.10.~~8.11. Proof of Sustainability certificates related to certification within a recognised Voluntary Scheme are exempt from clause 8.9; however, they must be matched to the chain of custody that the associated RGGOs follow. The Scheme issues a Guidance Document to members to provide further details on how this matching should be achieved.

~~8.11.~~8.12. Gas Producers shall provide the Scheme Administrator with independently verified details of their production facilities on request.

~~8.12.~~8.13. On an annual basis Gas Producers shall provide the Scheme Administrator with independent verification of the data they have submitted to the Scheme in respect of their feedstock and energy inputs and Green Gas outputs. Such verification must be provided according to the format and timeline published in Scheme Guidance documents. Where such verification is not provided the Scheme Administrator may restrict Gas Producer's access to the Registration Database and may conduct a verification process themselves or appoint an independent party to do so on their behalf.

Commented [JS8]: Clarity on the Data Verification Statement process and consequences of non-submission.

~~8.13.~~8.14. Gas Producers will inform the Scheme Administrator at the earliest opportunity of any information which may give rise to the need for RGGOs to be withdrawn.

~~8.14.~~8.15. Gas Producers agree that information about their production facilities and their Green Gas outputs contained within RGGOs will be shared with Account Holders and End-Use Consumers when RGGOs are transferred or allocated to them.

9. Account Holders

9.1. Account Holders have the ability to receive into their Trader Accounts RGGOs offered to them by Gas Producers, ~~and~~ other Account Holders and (where described in the Scheme's Guidance Documents regarding Imports) accounts in other registries. ~~.~~

9.2. Account Holders may initiate Transfer Requests by logging into their Trader Accounts and following the processes defined in the Scheme's Guidance Documents. ~~to enter the required information.~~

9.2.1. Account Holders may initiate Cancellation Requests ~~which allocate RGGOs to End-Use Consumers,~~ by logging into their Trader Accounts and following the processes defined in the Scheme's Guidance Documents. ~~to enter the required information.~~

9.2.2. Account Holders may initiate Exports by logging into their Trader Accounts and following the processes described in the Scheme's Guidance Documents.

Commented [JS9]: Align with the equivalent description of Producers actions and describe each action in a consistent way.

9.3. ~~The UK is linked to the European gas grid and the Scheme considers that where there is a continuous connection between the UK gas grid and a gas grid in an EU, EFTA, or EEA member state, those gas grids are part of the same Distribution Network. As such, Account~~

~~Holders are able to allocate RGGOs for Green Gas injected into the UK gas grid, to End-Use Consumers who consume gas from those grids~~.

Commented [JS10]: Moved to section below - relevant to Producer and Account Holders

~~9.4. Account Holders marketing Green Gas Tariffs should pay due regard to Section 21 "Marketing Green Gas" and Rule 10.5 and must put in place robust processes to ensure that they are meeting their commitments to End-Use Consumers signed up to that Tariff by retiring an appropriate quantity of RGGOs.~~

~~9.5. Where appropriate the Scheme Administrator will report instances of suspected fraud or misleading claims to the relevant authorities.~~

~~9.6.~~9.4. ~~As per Rule 7.7 Account Holders must respond to reasonable requests for information from the Scheme Administrator in respect of the operation of their Green Gas Tariffs. They should pay due regard to any Guidance Documents issued by the Scheme in relation to Green Gas Tariffs.~~

Commented [JS11]: Moved to below

10. Allocating RGGOs to End-Use Consumers

10.1. End-Use Consumers are parties who are allocated RGGOs in respect of gas they have consumed. They may be domestic or non-domestic gas consumers and may be allocated RGGOs individually or as a group where they have signed up to a Green Gas Tariff. They may also be referred to as Beneficiaries.

10.2. The gas they have consumed must have been withdrawn from the same Distribution Network into which the Green Gas, represented by the RGGOs they have been allocated, was injected. The UK gas grid is linked to the European gas grid and the Scheme considers that where there is a continuous connection between the UK gas grid and a gas grid in an EU, EFTA, or EEA member state, those gas grids are part of the same Distribution Network. As such, Account Holders are able to allocate RGGOs for Green Gas injected into the UK or the wider European gas grid, to End-Use Consumers who consume gas from those grids

Commented [JS12]: Moved from section above.

10.3. End-Use Consumers may be allocated RGGOs by any Account Holder participating in the Scheme.

10.4. Account Holders allocate RGGOs to an End-Use Consumer by naming them as the beneficiary when making a Cancellation Request. A Cancellation Statement listing the relevant RGGOs is then automatically generated in the End-Use Consumer's name. The relevant RGGOs are Cancelled, and the Registration Database logs them as allocated to that End-Use Consumer.

10.5. Where Account Holders decide to offer domestic or non-domestic End-Use Consumers a Green Gas Tariff that is made up of a proportion of Green Gas, only RGGOs equivalent to the Green Gas proportion of the total are Cancelled~~retired~~ and listed on a

Commented [JS13]: Correcting terminology

Cancellation Statement.

10.6. Allocation of RGGOs to an End-Use Consumer may represent a claim of Green Gas use based on the principles of Book and Claim or on the principles of Mass Balance. The ability of Scheme Participants and End-Use Consumers to claim they have Mass Balanced Green Gas is determined by relevant regulators and other parties external to the Scheme.

10.7. The Scheme Administrator makes no claim to the validity of RGGOs in entitling a Scheme Participant or End-Use Consumer to claim any consumption subsidy that may be payable inside or outside of the UK. The validity of RGGOs within such consumption subsidiesy's is determined solely by the regulator of those schemes.

Commented [JS14]: Correct grammar

10.8. The Scheme Administrator makes no claim to the validity of RGGOs and Cancellation Statements within any government scheme, subsidy, or emission trading mechanism including the EU ETS and UK ETS. The validity of RGGOs within such schemes is determined solely by the regulator of those schemes.

11. Associate Members

11.1. GDNOs, and other parties involved in the gas industry, who wish to support the development of the Green Gas sector, but who do not wish to have access to a Producer or Trader Account, may participate in the Scheme as Associate Members.

12. Issuing Renewable Gas Guarantees of Origin

12.1. When a Gas Producer submits to the Scheme a Production Declaration regarding Green Gas injected into a Distribution Network and containing the necessary evidence, the Registration Database issues a RGGO for each unit of Green Gas injected (subject to deductions for fossil gas and electricity from fossil sources used in the production process if applicable).

12.2. RGGOs record at least the following information:

12.2.1. the identity of the Gas Producer;

12.2.2. the technology by which the Green Gas was produced;

12.2.3. the feedstock that was used in the Green Gas production process;

12.2.4. the kWh or MWh number (or other unit used), or sequence/range of ~~kWh or MWh~~ numbers indicating a total amount, relating to that Gas Producer's Green Gas injection into a Distribution Network over a given time period;

Commented [JS15]: Other units e.g. KG may be used for green gases e.g. BiogenicCO2

12.2.5. the location and Distribution Network into which the Green Gas was injected;

12.2.6. the time period over which the Green Gas was injected; and

12.2.7. information regarding any government Production Support, such as the NDRHI, that a Green Gas may have received.

12.3. Further to the information above, additional information may be included depending on its availability and the technical capacity of the Registration Database in use at the time.

12.4. The Scheme provides information on its website about the different technologies and biomass and non-biomass feedstocks used to produce Green Gas as well as information about the identity of Gas Producers participating in the Scheme.

12.5. As per clause 8.3 Gas Producers are responsible for the accuracy of their Production Declarations and, as per 8.13, Gas Producers will inform the Scheme Administrator at the earliest opportunity of any information which may give rise to the need for RGGOs to be withdrawn. The Scheme Administrator takes reasonable measures to assess the accuracy of Production Declarations on which RGGOs are issued for example, where possible comparing the Green Gas registered on the Registration Database with submissions provided to Ofgem and other government regulators and administrators.

12.6. When issuing RGGOs the Scheme Administrator is provided with evidence of the environmental attributes of the Green Gas they are issued in respect of. This evidence may come from the processes of the NDRHI, GGSS, RTFO or LCHS, or be provided by documentation related to a Voluntary Scheme recognised by the European Commission.

12.7. Where RGGOs are issued in respect of Green Gas for which a Gas Producer has made a claim for support under the NDRHI, GGSS, or other government defined schemes, evidence of that support must be provided, and it will be recorded within the RGGO.

12.8. Where RGGOs are issued in respect of Green Gas where no claim for a NDRHI or GGSS support payment has been made, evidence must still be provided to the Scheme that the environmental attributes of the Green Gas meet a recognised set of sustainability criteria, such as those referenced in Rule 3.

12.9. Where RGGOs are issued based on the ~~import~~Import of an EAC from another registry the Scheme Administrator will follow the processes set out by the transfer scheme under which that transfer was made. The Scheme will provide details of the transfer schemes that it participates in on its website. Responsibility for the accuracy of RGGOs issued via these transfer schemes rests with:

Commented [JS16]: Now a defined term

12.9.1. the producer of the Green Gas to which the EACs relate to;

12.9.2. the registry that initially issued those EACs to the producer of the Green Gas; and

12.9.3. any intermediary registries that may have handled those EACs.

12.10. The Scheme's responsibility is limited to the accurate issuing of the RGGOs based on the information received.

13. Transferring and receiving RGGOs

13.1. Scheme Participants can transfer and receive RGGOs to and from their Producer and Trader accounts according to the functionality of the Registration Database in use at the time.

13.2. The Scheme Administrator publishes a Guidance Document on the transfer of RGGOs and other EACs that may be possible between accounts in the GGCS Registration Database and accounts in other Green Gas registries. The potential for such transfers is determined by the rules and processes of any transfer schemes that the Scheme participates in and the continuation of such participation. It is also determined by the willingness of other participants of transfer schemes to exchange EACs and RGGOs with GGCS Scheme Participants.

14. Balancing and Withdrawal~~ing~~ of RGGOs

Commented [JS17]: More detailed description of Balancing and Withdrawal actions and how and when they may be applied. Both are now defined terms (see schedule at the end of this document)

14.1. After issuing RGGOs the Scheme Administrator may become aware of:

14.1.1. errors in the Production Declarations related to those RGGOs;

14.1.2. non-compliance with the requirements set out in Rule 3; or

14.1.3. information that would otherwise affect the details recorded in the RGGOs.

14.2. If such a situation arises the Scheme Administrator will~~, in the first instance, seek to~~ correct errors in the information recorded in RGGOs~~,~~ either by;~~by~~

14.2.1. Balancing, by way of attributing RGGOs issued in respect of the non-compliant injection towards a subsequent equivalent injection of compliant Green Gas by the relevant Gas Producer, or by;

~~14.1.4.~~14.2.2. Withdrawal, being the removal of the relevant RGGOs from circulation and recording them as withdrawn within the Registration Database~~.~~

~~14.2. If such a correction is not possible or practical the Scheme Administrator may declare the injection non-compliant and withdraw the RGGOs affected.~~

14.3. Where a Balancing action is carried out Producers and Account Holders may or may not be informed depending on the scale of the actions relative to the total amount of green gas injected in the relevant period.

~~14.3.~~14.4. Where RGGOs are withdrawn the Scheme Administrator will, as soon as reasonably practicable, notify the Gas Producer into whose account the RGGOs were originally issued and, if applicable, the Account Holder who is holding the RGGOs at the time of W~~w~~ithdrawal.

~~14.4.~~14.5. Where the ~~withdrawn~~ RGGOs that have been found to be non-complaint cannot be balanced in subsequent equivalent injections, and have already been Cancelled~~retired~~ and allocated to an End-Use Consumer, the Scheme Administrator will, as soon as reasonably practicable, notify the Scheme Participant who issued a Cancellation Request for the RGGOs. That Scheme Participant must notify the End-Use Consumer who has been allocated the RGGOs that their Cancellation Statement is no longer valid ~~those RGGOs have been withdrawn~~ and verify that they have done this to the Scheme Administrator.

~~14.5. Withdrawn RGGOs are not available to be transferred to other Account Holders or to be allocated to End-Use Consumers. The process for withdrawal is determined by the functionality of the Registration Database at the time and may include:~~

~~14.6. a requirement by the Scheme Administrator for a Scheme Participant to transfer relevant RGGOs to an administrative account; or,~~

~~14.7. the direct removal by the Scheme Administrator of RGGOs from the relevant Producer or Trader account.~~

Commented [JS18]: Included above and described in the schedule

~~14.8.~~14.6. The Scheme Administrator may publish a list of withdrawn RGGOs where it deems it to be necessary or desirable.

~~14.9.~~14.7. Scheme Participants take at their own risk the possibility that RGGOs may be withdrawn according to the provisions of these Rules.

15. Cancelling RGGOs

15.1. When an Account Holder makes a Cancellation Request the Registration Database issues an electronic Cancellation Statement that allocates RGGOs to an End-Use Consumer (also referred to as a Beneficiary).

15.2. Where the Scheme has provided an exemption under rule 8.9 and a secondary EAC has been issued for the same unit of Green Gas represented by a RGGO, then those RGGOs may be Cancelled without allocation to an End-Use Consumer. Such cancellations will be for the sole purpose of removing the potential for double counting, with the remaining secondary EAC becoming the sole evidence of environmental attributes. The Scheme will provide information in its Guidance Documents on how such Cancellations should be carried out. The Cancellation Fee will be applied for any Cancellations carried out in accordance with this clause.

Commented [JS19]: Providing for instances where RGGO holders are transferring on a PoS but their counterparty does not which to receive the RGGOs. To reduce the risk of double counting that RGGO should be Cancelled and not left in the account where it could be used for another purpose at a later date.

~~15.1.~~15.3. Where described in Scheme Guidance Documents related to the Export of RGGOs then Cancellation Requests may be made that to enable those processes. Those Cancellation Requests may identify accounts in other schemes as the Beneficiary. Such Cancellation Requests are restricted to specific circumstances as described in Guidance Documents and relevant Export Fees will apply.

Commented [JS20]: There may be some Exports that are carried out via a Cancellation process where the target registry is not part of the ERGAR CoO Scheme. Such exports are not currently allowed by may occur in the future and will be described in a Guidance Document.

~~15.2.~~15.4. The validity of any claims concerning the use of Green Gas based on cancelled RGGOs, made by an End-Use Consumer or an Account Holder, whether for regulatory or commercial purposes, is determined by external parties.

16. Importing or Exporting RGGOs

16.1. The Scheme's involvement in any external scheme or arrangement to facilitate the Import or Export of RGGOs with other schemes, will be published on the Scheme's website and described in the Scheme's Guidance Documents. The Scheme's involvement in such schemes and arrangements are subject to change.

16.2. Importing and Exporting of RGGOs is undertaken via the processes described in the Scheme's Guidance Documents.

16.3. Imports and Exports are defined transaction types within the Registration Database which are distinct to RGGO issuing and Cancellation and subject to their own fees.

Commented [JS21]: Bringing into the Rules that Import and Exports are defined transaction types in the Registration Database and subject to a distinct fee.

Commented [JS22R21]: Guidance Document 7 provides the relevant details on the process - Ggcs Guidance Documents - News - Green Gas Certification Scheme

~~16.~~17. Expiry of RGGOs

~~16.1.~~17.1. If, three years and three months after the date of the injection of Green Gas into a Distribution Network, RGGOs created in respect of that Green Gas have not been Cancelled~~retired~~ or withdrawn, they will expire and will no longer be available to Gas Producers or Account Holders.

Commented [JS23]: Correcting terminology

~~16.2.~~17.2. The Scheme will provide guidance to Scheme Participants on how the Registration Database will calculate the date of injection of Green Gas and the three year three month period.

~~17.~~18. Data Handling, Back-up and security

~~17.1.~~18.1. The Scheme Administrator uses all reasonable endeavours to ensure the Registration Database it procures is protected against fraudulent use and remains operational for the duration of the Scheme, while complying with relevant data protection laws.

18.2. The attributes of the Registration Database are described on the Scheme's website.

~~17.2.~~18.3. Scheme Participants must not enter any Personal Data into the Registration Database in the process of making Transfer Requests or Cancellation Requests

Commented [JS24]: We have identified the potential that members might add individual consumer names in cancellation statements and personal data in the message that can be included in a transfer request. While we could set up a framework to handle that data we don't believe that is it's a necessary use of the Registration Database

~~18.~~19. Confidentiality

~~18.1.~~19.1. The Scheme Administrator agrees not to disclose information regarding any individual Transfer Requests or Cancellation Requests and Statements to third parties without the express permission of the Scheme Participants concerned.

~~18.2.~~19.2. Aggregated and anonymised statistics are published by the Scheme from time to time.

~~18.3.~~19.3. Confidentiality clauses are included in letter agreements signed by Scheme Participants.

~~19.~~20. Auditing

~~19.1.~~20.1. The Scheme Administrator maintains arrangements for auditing the accuracy of the meter readings and other underlying data e.g. GHG emission calculations, on which RGGOs are issued. Such audits, as currently arranged via the GGCS Data Verification Statement process, may take place after RGGOs are issued and may lead to RGGOs being withdrawn.

~~19.2.~~20.2. The Scheme Administrator maintains arrangements for auditing a representative sample of Transfer Requests, Transfers, Cancellation Requests, and Cancellation Statements on an annual basis.

~~19.3.~~20.3. The Scheme Administrator instructs an independent auditor to verify on an annual basis that the Scheme Administrator is meeting its obligations to Scheme Participants and that the Scheme is meeting its objects.

~~20.~~21. Fees

~~20.1.~~21.1. The fees are set annually and in advance of the start of the calendar year in which they are applied, after consultation with the Oversight Panel and are published on the Scheme's website.

~~20.2.~~21.2. The~~ere are two~~ fees currently payable for participating in the Scheme ~~being~~are:

~~20.2.1.~~21.2.1. an Annual Participation Fee; and

21.2.2. an Additional Administration Fee to be charged when a Gas Producer submits more than five (5) Production Declarations related to any 12 month production period

21.2.3. a RGGO Cancellation Fee which is a charge levied on the Cancellation of RGGOs ~~to End-Use Consumers or~~in accordance with section 15 of these rules.

21.2.4. a RGGO Export fee which is a charge levied on Export of RGGOs to other green gas registries

~~20.2.2.~~21.2.5. ~~Cancellations made for the purpose of transferring RGGOs to another Scheme.~~a RGGO Import fee which is a charge levied on the Import of RGGOs from other green gas registries.

Commented [JS25]: Description of the new fees proposed to be in place from Jan 1st 2027.

Note the "Additional Administration Fee" is current set at Zero in our proposal for 2027.

~~21.~~22. Marketing Green Gas

~~21.1.~~22.1. Scheme Participants should take a conservative approach in making any claims that their purchase or sales of RGGOs, and payment of fees to the Scheme, create any additionality in the amount of Green Gas being produced.

~~21.2.~~22.2. They should pay due regard to any guidance on additionality claims published by the Scheme which are made available on the Scheme website.

22.3. Scheme Participants must be honest and transparent when marketing Green Gas to End-Use Consumers. In accordance with Rule 2.2 they should not claim that the allocation of RGGOs represents the physical supply of Green Gas to an End-Use Consumer. Where appropriate the process of issuing, transferring, and cancelling RGGOs should be explained.~~-~~

22.4. ~~Account Holders~~Scheme Participants marketing Green Gas Tariffs should pay due regard to ~~Section 21 "Marketing Green Gas" and~~ Rule 10.5 and must put in place robust processes to ensure that they are meeting their commitments to End-Use Consumers signed up to that Tariff by retiring an appropriate quantity of RGGOs.

22.5. Where appropriate the Scheme Administrator will report instances of suspected fraud or misleading claims to the relevant authorities.

~~21.3.~~22.6. As per Rule 7.7 Account Holders must respond to reasonable requests for information from the Scheme Administrator in respect of the operation of their Green Gas Tariffs. They should pay due regard to any Guidance Documents issued by the Scheme in relation to Green Gas Tariffs.

Commented [JS26]: Moved from section above and made relevant to all Scheme Participants (not just Account Holders)

~~21.4.~~22.7. Scheme Participants may use the Scheme's logo in accordance with the Scheme Administrator's guidance.

~~22.~~23. Reporting

~~22.1.~~23.1. The Scheme Administrator produces an annual report which details the operation of the Scheme over the preceding year. The report includes information on the amount of

Green Gas registered and RGGOs issued and ~~retired.~~Cancelled.

Commented [JS27]: Correcting terminology

~~23.~~24. Governance

~~23.1.~~24.1. Scheme Participants, who have paid the relevant fees, agreed to the terms of the letter agreement and completed the relevant registration forms, are members of the Oversight Panel.

~~23.2.~~24.2. The Oversight Panel has an independent chair, being a person not employed by REAL to administer the day to day running of the Scheme or an employee of any Scheme Participant.

~~23.3.~~24.3. The Oversight Panel meets twice a year but may hold additional meetings at the request of the Scheme Administrator or Scheme Participants.

~~23.4.~~24.4. Independent parties, End-Use Consumers, environmental group representatives and other stakeholders may attend Oversight Panel meetings, either at the invitation of the Oversight Panel or as appointed by the Scheme Administrator.

~~23.5.~~24.5. The Oversight Panel considers the results of audits and is consulted on rule changes and fee levels.

~~23.6.~~24.6. The Oversight Panel's Terms of Reference are set and amended as necessary by the Panel.

~~23.7.~~24.7. The day to day running of the Scheme is undertaken by the Scheme Administrator. In addition to the Scheme Rules, and the terms of letter agreements signed by Scheme Participants, the Scheme Administrator issues Guidance Documents. These documents allow Scheme Participants to make best use of the Scheme and ensure it is used in a way that encourages confidence and understanding of the Green Gas market.

~~23.8.~~24.8. The Directors of Renewable Energy Assurance Limited (REAL) fulfil their obligations including filing accounts with Companies House, ensuring the company meets its statutory obligations and making strategic and high-level operational decisions about the Scheme.

~~24.~~25. Links to other schemes

~~24.1.~~25.1. REAL administers various consumer codes and certification schemes, including the Biofertiliser Certification Scheme and the Compost Certification Scheme. A full list is available on the website: https://www.realschemes.org.uk/.

~~24.2.~~25.2. There is no obligation on Scheme Participants to participate in any other scheme operated by REAL or to be members of The Association for Renewable Energy and Clean Technology (REA).

~~24.3. The Scheme's involvement in any external scheme or arrangement to facilitate the transfer of RGGOs with other schemes, will be published on the Scheme's website. The Scheme's involvement in such schemes and arrangements are subject to change.~~

Commented [JS28]: Moved to section 16.

Appendix A: Definitions of Key Terms

Account Holder	an individual or corporate body, who registers with the Scheme and is provided with access to a Trader Account. May also be referred to in Guidance Documents as a Trader.
Book and Claim	A Book and Claim approach means that trade of an EAC is not linked to the trade of the physical product; however, rule 10.2 must be applied.
Balancing	the process of issuing a greater or lesser number of RGGOs, or RGGOs with labels that differ from the actual characteristics of a Green Gas injection, to ensure that the RGGOs issued across two separate injection periods accurately reflect the total volume and characteristics of the Green Gas injected during those periods
Cancellation Request	a request by a Scheme Participant~~the Producer~~ to cancel ascertained RGGOs and generate a Cancellation Statement. Also referred to as a Retirement Request.
Cancellation Statement	an electronic file generated automatically by the Registration Database on receipt of a Cancellation Request. The statement contains details of the RGGOs and in relation to the Green Gas, the injection date, the technology/feedstock type and its location, the amount, CO_2 emissions and the name of the Gas Producer as well as the details of the beneficiary of the RGGOs being an End-Use Consumer or Green Gas Tariff.
Compliance Committee	a committee formed by the Scheme Administrator with a chair independent of the day-to-day running of the Scheme. The committee assesses internal audits and recommends improvements to the Scheme.
Data Verification Statement	a statement completed by a qualified and independent person, according to a format determined by the Scheme Administrator. Further details are provided to Scheme Participants in a Guidance Document.
Distribution Network	a system for transporting gas from a Gas Producer to an End-Use Consumer. Distribution Networks include the NTS, GDN, gas transportation infrastructure operated by IGTs (whether or not connected to the NTS or a GDN), and systems of distribution via bottles and tankers that form a distinct network.
End-Use Consumer	any person who is allocated RGGOs in respect of gas consumed from the same Distribution Network into which the Green Gas that the RGGOs relate to was injected.
Energy Attribute Certificate (EAC)	an electronic data package that represents the environmental attributes of a unit of energy production (of which RGGOs are an example) that can be traded separately to the energy that it relates to.
ERGaR	European Renewable Gas Registry.

Commented [JS29]: Defining a Balancing action

Commented [JS30]: Correct mistake - any participant can make a Cancellation Request

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Export	To transfer an RGGO held in the GGCS Registration Database to an account in a registry that is outside the GGCS Registration Database.
Gas Distribution Network Operator (GDNO)	as defined in the UNC, a person which is, and in its capacity as, the owner or operator of one or more LDZ(s) and licensee under a Transporter's Licence authorising the conveyance of gas through such LDZs.
Gas Producer	an individual or corporate body which produces Green Gas.
Gas Supplier	the holder of a license issued by the Secretary of State pursuant to section 7A(1) or 7A(2) of the Gas Act 1986.
GDN	Gas Distribution Networks being the Local Gas Distribution Zones as defined in TPDA 1.2.2 of the UNC.
GGSS	the Green Gas Support Scheme, as established by the Green Gas Support Scheme Regulations 2021 No. 1335.
Green Gas	a gas that meets the criteria set out in the Scheme Rules.
Green Gas Tariff	a product offered by a Gas Supplier whereby all or a portion of the ~~Green Gas~~gas consumption of End-Use Consumers signed up to that tariff is matched to RGGOs that have been Cancelled~~retired~~ and allocated to that tariff.
Guidance Documents	guidance issued to Scheme Participants from time to time under the Scheme Rules.
IGT	Independent Gas Transporter.
Import	To transfer an Environmental Attribute Certificate, representing a unit of green gas, that is held in a registry outside the GGCS Registration Database into a Producer Account or Trader Account in the Registration Database.
Mass Balance	a chain of custody where an EAC is linked to the physical product. It is defined by various government and non-governmental guidance documents. Scheme Participants should pay due regard to those documents, for example the Renewable Transport Fuel Obligation Process Guidance published by the UK Government.
NDRHI	the Non-Domestic Renewable Heat Incentive. A UK government scheme providing financial support in respect of the generation of heat from renewable sources ~~or any other Government financial~~

Commented [JS31]: Define the Export process

Commented [JS32]: Correcting terminology

Commented [JS33]: Define the Import process

	~~incentive scheme to promote renewable heat which confers pecuniary benefit on a Gas Producer, whether or not currently in existence, flowing from the use of Green Gas to provide heating.~~
NTS	National Transmission System. The high-pressure gas network which transports gas from the entry terminals to gas distribution networks, or directly to power stations and other large industrial users.
Oversight Panel	a panel comprising representatives of Scheme Participants, together with representatives of other stakeholders including consumer and environmental bodies, as appointed by the Scheme Administrator or invited by the Panel. It is chaired by a person independent of the Scheme.
Personal Data	Any data that would be defined as Personal Data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
Producer	a Scheme Participant who has access to a Producer Account and makes Production Declarations. Also referred to as a Gas Producer.
Producer Account	a secure area of the Registration Database where the Producer makes Production Declarations in respect of the Biomethane generated by the Production Devices detailed in Schedule 3, holds RGGOs, makes Transfer Requests and Cancellation Requests ~~and, in the event that the Registration Database provides such functionality,~~and executes other functions as may become available from time to time. ~~makes Cancellation Requests~~ .
Production Declaration	a declaration made by a Producer to the Scheme Administrator regarding an amount of Green Gas placed into a Distribution Network by the Producer's Production Device, which includes information on environmental attributes of the biomass and the biomass and non-biomass inputs used.
REAL	Renewable Energy Assurance Limited. A wholly owned subsidiary company of the Renewable Energy Association.
Registration Database	the information technology system which records the issuing of RGGOs, their transfer between Scheme Participants and their cancellation or expiry.
RGGO	a Renewable Gas Guarantee of Origin issued by the Registration Database for each kWh of Green Gas registered on the Scheme, where evidence has been provided of its injection into a Distribution Network.
RGGO Cancellation Fee	a charge levied on the aggregate of RGGOs in respect of which the Producer has made Cancellation Requests during a calendar month. Also referred to as a RGGO Retirement Fee.

Commented [JS34]: Other scheme in place is the GGSS which is defined.

Commented [JS35]: This functionality is now in place can definition can be updated.

RTFO	Renewable Transport Fuel Obligation.
Scheme	the Green Gas Certification Scheme.
Scheme Administrator	REAL.
Scheme Participant	an individual, partnership or corporate body that joins the Scheme and agrees to be bound by its terms and conditions, the Scheme Rules and relevant Guidance Documents and whose participation has not been terminated.
Scheme Rules	the rules governing the Scheme.
Scheme Website	https://www.greengas.org.uk/, or any other website which the Scheme Administrator may establish.
Trader Account	a secure area of the Registration Database where a Scheme Participant may receive and hold RGGOs, make Transfer Requests and Cancellation Requests and execute other functions as may become available from time to time.
Transfer Request	a request made via the secure area of the Registration Database by a Gas Producer or Account Holder to transfer RGGOs to a Producer Account or Trader Account.
UNC	Uniform Network Code.
Voluntary Schemes	schemes recognised by the European commission for evidencing the sustainability of biofuels and other types of renewable energy. The European Commission publishes a list of approved Voluntary Schemes on its website.
Withdrawal	An administrative function within the Registration Database whereby the Scheme Administrator marks RGGOs as withdrawn and they are no longer available to the Producer or Account Holder and cannot be Exported or allocated to any End-Use Consumer.

Commented [JS36]: Provide a definition of the withdrawal function in the Registration Database.