



Guidance Document 7 – RGGO transfers to and from the Green Gas Certification Scheme

Version 2.0 – May 2025

1. INTRODUCTION

The GGCS is a member of the ERGaR Certificate of Origin (CoO) Scheme¹ and all transfers of RGGOs, to and from DENA and any other registries are conducted via that Scheme and its IT infrastructure, according to the processes outlined in this document.

The aim of the ERGaR CoO Scheme is to allow RGGOs² to be exchanged between the accounts of the registries involved; however, there are currently significant restrictions in place.

This guidance document details who the current participants are, what restrictions there may be, and what criteria must be met for the import and export of RGGOs with these registries.

¹ <http://www.ergar.org/ergar-coo-scheme/>



² RGGOs are the Environmental Attribute Certificate issued by the GGCS. Other ERGaR CoO Scheme participants use different terminology to describe the Environmental Attribute Certificates they issue, which may have slightly different attributes than GGCS RGGOs. The ERGaR CoO Scheme considers all these certificates to be Certificates of Origin (CoO). For consistency with other GGCS guidance documents this document refers all Energy Attribute Certificates issued by any ERGaR CoO Scheme member as RGGOs.

NB: The GGCS stresses in the strongest possible terms that GGCS Scheme Participants should read all of the disclaimers in Section 3 and carefully consider the consequences of those outcomes before entering into any agreements to transfer RGGOs between registries.

2. SUMMARY OF CURRENT PARTICIPANTS AND RESTRICTIONS IN PLACE

The table below gives a quick overview of current ERGaR CoO Scheme participants and the restrictions in place (at time of publication of this version being 07/05/2025). A registry being a participant of the Scheme does not automatically mean that imports and exports can be made. Furthermore, where imports and exports are possible, there may be restrictions related to expiry dates, auditing requirements, and loss of data on Energy Source labels (previously referred to as biomass information). Further detail is provided in Section 4.

Registry	Exports? (from GGCS to...)	Imports? (into GGCS from...)
<p>AGCS – Austria https://www.agcs.at/</p> 	Yes – you can export RGGOs from GGCS to AGCS.	Yes – you can import RGGOs from AGCS to GGCS.

Registry	Exports? (from GGCS to...)	Imports? (into GGCS from...)
DENA Biogasregister – Germany www.dena.de 	Yes – you can export RGGOs from GGCS to DENA.	Yes – you can import RGGOs from DENA to GGCS.
Energinet – Denmark³ https://en.energinet.dk/ 	Restrictions in place – you cannot currently export RGGOs to Energinet from GGCS due to the UK’s status as a “third country” in relation to the EU.	Yes – you can import RGGOs from Energinet to the GGCS.
Pronovo – Switzerland https://pronovo.ch/ 	Yes – you can export RGGOs (with a waste or residue energy source label) from GGCS to Pronovo.	No - There are currently no plans to import RGGOs from Pronovo to GGCS.
SPP Distribucia – Slovakia https://www.spp-distribucia.sk/ 	Restrictions in place – you cannot currently export RGGOs to SPP Distribúcia from GGCS due to the UK’s status as a “third country” in relation to the EU.	Yes – you can import RGGOs from SPP Distribúcia to GGCS.
VertiCer – Netherlands https://verticer.eu/en/ 	Restrictions in place – you cannot currently export RGGOs to VertiCer from GGCS due to the UK’s status as a “third country” in relation to the EU.	Yes – you can import RGGOs from VertiCer to the GGCS. ⁴

³ Note that this is an addition since v1.7 of this guidance.

⁴ Note that this is a change from v1.6 of this guidance. A small number of transfers were made from VertiCer to GGCS in 2021, after which we understood that our status as a third country would prevent further imports or exports. VertiCer have since revisited their position regarding imports, and we are happy to receive imports from them.

3. DISCLAIMERS

The GGCS stresses in the strongest possible terms that all of the below disclaimers must be read, understood, and consequences carefully considered before entering into any agreements to transfer RGGOs between registries.

Traders must not assume that any RGGOs they currently own, or purchase in the future, will be eligible to be transferred via the ERGaR CoO Scheme.

3.1 Criteria to be met

Only when the criteria set out in this guidance and in the guidance of other ERGaR CoO Scheme participants are met, can transfers take place. Such guidance is subject to change.

RGGO transfers are subject to the rules of the ERGaR CoO Scheme, the rules of the registries involved, and any relevant national regulations in the UK and importing/exporting countries.

Criteria, for example around auditing of production data, expiry dates, and biomass labelling, may apply. These criteria may prevent transfers or affect the completeness of the information sent and received by ERGaR CoO Scheme participants.

3.2 Even when criteria are met, restrictions may apply for legal or technical reasons

Participation in the ERGaR CoO Scheme does not guarantee that RGGOs held in a registry are eligible to be received by other participating registries or that all information within a RGGO will be transferred into the target registry.

Traders must contact other registries involved to understand any processes and restrictions they have in place. GGCS seeks to keep its members informed (via this guidance document) about the processes and restrictions imposed by other ERGaR CoO Scheme participants, but we cannot guarantee what these may be and when they might change.

3.3 Use of imported or exported RGGOs

GGCS does not guarantee in any way that RGGOs transferred to other registries will allow their owners to receive any subsidy, access any support scheme, meet any obligation, or reduce reported emissions (for example, within the European Union Emission Trading Scheme).

Transferred RGGOs do not count towards the national renewable energy targets of either the UK or any other country.

3.4 Risk of future restrictions and/or GGCS or other members ending their participation in the ERGaR CoO Scheme

Other members of the ERGaR CoO scheme are not obliged to accept transfers of RGGOs from the GGCS, or to allow transfers to the GGCS, and they may be restricted from doing so because of the UK's status as a "third country" in relation to the European Union.

Our intention is for our participation in the ERGaR CoO Scheme to be ongoing, however, we cannot guarantee this will be the case. Our participation may be terminated by mutual consent between the GGCS Scheme Administrator and ERGaR, or a material breach of our agreement with ERGaR may lead to immediate termination of our participation. In a situation where our participation ends, we will inform members and seek to complete as many planned transfers as possible.

We believe that all current members of the ERGaR CoO Scheme intend to continue their participation in the Scheme. However, neither ERGaR (as the scheme operator) or any of the scheme participants e.g. DENA, can guarantee that they will. Traders should pay particular attention to the appointment by EU member states of issuing bodies for Guarantees of Origin (GoOs) under the Renewable Energy Directive (RED). ERGaR CoO Scheme members may or may not be appointed as issuing bodies and it may affect their ability or desire to participate in the Scheme.

3.5 Further considerations

If you are in any doubt about any aspect of this guidance, then you should contact the GGCS Scheme Administrator before proceeding to enter into any agreements to transfer RGGOs between registries.

Contractual arrangements between GGCS members and their counterparties are outside the scope of the GGCS and the ERGaR CoO Scheme. However, we strongly encourage members to account for the possibility that intended transfers may not be possible due to factors outside their and the GGCS's control.

Transfers of RGGOs to and from biomethane registries other than those participating in the ERGaR CoO Scheme are not possible. The development of any such process or practice will not be possible without the specific agreement of the GGCS and the other registry or certification scheme involved. We withhold the right not to agree to the use of the GGCS to transfer RGGOs into another registry or certification scheme.

4. EXPORTS – TRANSFERS OF RGGOS FROM THE GGCS TO OTHER REGISTRIES

For RGGOs to be eligible for transfer to any other registry, Criteria 1 and 2 must always be met. Criteria 3 may apply depending on the registry to which the RGGOs are being transferred.

Criteria 1 – at least one of the following documents has been made available to the GGCS* by the Gas Producer to whom the RGGOs were issued.

- Non-Domestic Renewable Heat Incentive (NDRHI) Annual Sustainability Report
- Green Gas Support Scheme (GGSS) Annual Sustainability Audit Report
- GGCS Data Verification Statement (DVS)
- International Sustainability and Carbon Certification (ISCC) Audit

For further details on these reports, who creates them, and when they may or may not be available, please refer to later sections of this guidance.

*The purpose of these documents is to provide the GGCS and other members of the ERGaR CoO Scheme with assurance of a Gas Producer's location, production capacity and systems to record its inputs and outputs. *If the document provided shows problems with the plant's systems to record its inputs or outputs, then Criteria 1 will not have been met.*

Criteria 2 – at the point the target registry accepts the transfer, RGGOs have a valid status in the GGCS i.e. the expiry date has not been reached.

RGGO expiry dates are calculated as 39 months from the date that the injection period ends. An example of this calculation is as follows:

- RGGOs represent gas injected between 19 March 2021 to 18 June 2021.
- The date that the injection period ends is 18 June 2021.
- The expiry date is 18 June 2021 plus 39 months which is 18 September 2024.

As the transfer process is likely to take at least ten working days, the GGCS will only accept transfer requests where the RGGOs are within one month of expiry if the trader agrees to accept the risk of expiry during the transfer process.

Note that the expiry date is not shown in G-REX – it needs to be calculated by adding 39 months to the Production End Date.

Criteria 3 – a GGCS Data Verification Statement (DVS) has been provided by the Gas Producer to the GGCS, covering the relevant RGGOs and confirming that the RGGOs are accurate*

Registries currently requiring that Criteria 3 is met are AGCS, DENA, and Pronovo.

For further details on the GGCS DVS, who creates them, and when they may or may not have already been provided to the GGCS, please refer to later sections of this guidance.

The GGCS DVS is assurance that the data underlying the issuing process was correct and supports the number of RGGOs that were issued and their labelling with regard to:

- Energy Source label
- Sustainability criteria
- Dates of injection

*From time to time a DVS will show that RGGOs issued are not supported by the underlying data and are non-compliant. If so, Criteria 3 will not have been met until the GGCS resolves such issues.

4.1 Transferring RGGOs to AGCS Biomethan Register – Austria

(a) Criteria required

All RGGOs must meet Criteria 1, 2, and 3 to be valid for transfer. This means that a DVS must have been provided to GGCS by the producer covering the RGGOs being exported.

(b) Energy Source label

You can transfer RGGOs that contain the standard Energy Source labels that the GGCS records when issuing RGGOs for NDRHI or GGSS supported gas:

- **Biomass (Unspecified) Classification (Product/Co-Product)**
- **Biomass (Unspecified) Classification (Residue)**
- **Biomass (Unspecified) Classification (Waste)**
- **Biomass (Unspecified) Classification (Mixed)**

(c) Expiry date considerations

At the time of publication of this guidance AGCS does not implement an expiry date for RGGOs.

(d) Fees payable

RGGOs will be recorded as exported from the GGCS and the normal RGGO Cancellation Fee ([see here](#) for current fee levels) will apply. GGCS is not aware of AGCS's fee structure. You should contact AGCS directly to obtain further information on its fees.

(e) Status of RGGOs

We are not aware of the status of imported RGGOs in the AGCS system. Participants should contact AGCS directly for further details.

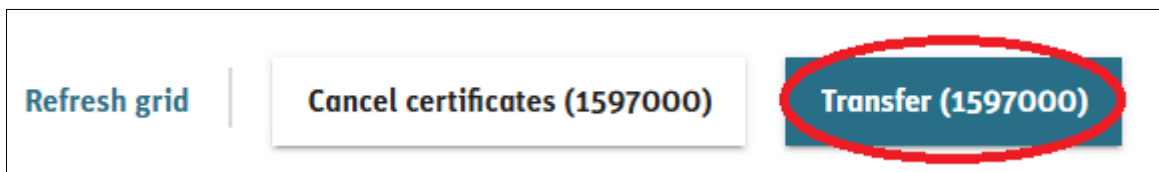
Neither GGCS, ERGaR, nor AGCS offer any assurance on the validity of transferred RGGOs to be used for compliance with any regulations, subsidies, or support schemes in operation in Austria or any other country.

(f) Initiating the Transfer

Navigate to the **Certificates** section of your G-REX account and **select the eligible bundle of RGGOs** you wish to transfer.

Certificates														
Certificate bundle				Account		Issuer				Energy source		Technology	Production period	
<input type="checkbox"/>	Volume	Unit	Status	Account number	Account name	Issuing country code	Issue date	Standard	Trading schemes	Energy source name	Technology name	Production start date	Production end date	
<input checked="" type="checkbox"/>	1 597 000	kWh	Active	[REDACTED]	Default Account	GB	04/12/2023	GGCS Biomethane	GGCS Biomethane RGGO	Biomass (Unspecified) Classification (Residue)	Anaerobic digestion	30/06/2023	29/09/2023	

Then click the **Transfer** button:



(g) Designating the Volume

Input the **Transfer volume** of the bundle you wish to transfer:

Transfer Certificates ✕

VOLUME

Selected volume: 1597000 kWh Transfer all selected certificates

Volume Percentage

Transfer volume * (i) Unit *

500 000,000

▲
▼

kWh

▼

Note that the value will be given three decimal places (shown after a comma) for example the value above is 500,000 kWh.

(h) Nominating the Receiver

RECEIVER

Domain *

Green Gas Certification Scheme ▼

Account Holder *

93X002105R - GGCS to AGCS Transfer Account (GGCS Admin) × ▼

Account *

643002406493021053 - GGCS Biomethane ▼

Enter account number/ member code ⓘ

Message to receiver ⓘ

Ensure that the **Domain** is set to **Green Gas Certification Scheme**.

In the Account Holder section, clear any default values by clicking the 'x' and Search for "**GGCS to AGCS**". Choose the **GGCS to AGCS Transfer Account** from the drop down menu.

If you are unable to find the specific account using the drop down, tick "Enter account number/ member code" and input **93X002105R**:

In the **Message to receiver** section provide the details of the target account in the AGCS registry that you are transferring. Provide each data point noted below ensuring that the details match those held by AGCS.

- Account ID
- Name
- Address (Street and Number)
- Address (City)
- Address (Post Code)

The format of the text must be as a single line and you must delimit the values using a dash or other symbol. For example;

ID 122345 - Austrian Trader GmbH - Herrengasse 10 - Vienna - 1010

The **Transfer Time** section will then allow you to submit the transfer immediately, or schedule it for a later date:

TRANSFER TIME

Transfer now

Schedule transfer

(i) Transfer Process and Timeframes

GGCS will then initiate the transfer on the ERGaR CoO Scheme platform and AGCS will receive a notification.

AGCS will check that the details of the transfer conform with their rules and processes, and the target trader will be informed about the RGGOs they are being offered from a GGCS account.

If the target trader accepts the offer, GGCS will be informed and then the RGGOs will be marked as exported and the RGGO Cancellation Fee will be applied.

Please note the following:

- You will not receive any notification from GGCS of the completion of a transfer.
- Depending on the processes of AGCS, the target trader may receive a notification that the RGGOs are now active in their account.

We aim for transfers to be completed within 10 working days of receiving the request; however, ERGaR CoO Scheme participants do not offer any guarantees on timing of transfer completion and traders should take a cautious approach. The transfer process is not automated, and timelines may be affected on the GGCS side, or the receiving registry's side, by levels of staff availability, or technical issues.

4.2 Transferring RGGOs to DENA

(a) Criteria required

All RGGOs must meet Criteria 1, 2, and 3 to be valid for transfer. This means that a DVS must have been provided to GGCS by the producer covering the RGGOs being exported.

(b) Energy Source label

You can transfer RGGOs that contain the standard Energy Source labels that the GGCS records when issuing RGGOs for NDRHI or GGSS-supported gas:

- **Biomass (Unspecified) Classification (Product/Co-Product)**
- **Biomass (Unspecified) Classification (Residue)**
- **Biomass (Unspecified) Classification (Waste)**
- **Biomass (Unspecified) Classification (Mixed)**

Our understanding at the date this guidance was published is that DENA are able to include Energy Source labels in their certificates. You may wish to contact info@dena.de for further information and we encourage you to carry out a “test” transfer or a small number of MWh to ensure you are happy with how this data field will appear in the DENA Certificate.

(c) Expiry date considerations

At the time of publication of this guidance DENA does not implement an expiry date for RGGOs.

(d) Fees payable

RGGOs will be recorded as exported from the GGCS and the normal RGGO Cancellation Fee ([see here](#) for current fee levels) will apply. To confirm the fees currently in place for DENA, you should contact them directly.

(e) Status of RGGOs

GGCS is aware that RGGOs imported from the GGCS are given a “yellow” status within the DENA biogas registry, being Book and Claim (not Mass Balance).

While held in a DENA account there is the potential that information may be added to these RGGOs regarding DENA Criteria, including evidence of Mass Balance. A DENA auditing procedure must be used, and you should contact DENA for more details⁵. GGCS are not involved in this process.

Neither GGCS, ERGaR, nor DENA offer any assurance on the validity of transferred RGGOs to be used for compliance with any regulations, subsidies, or support schemes in operation in Germany, or any other country.

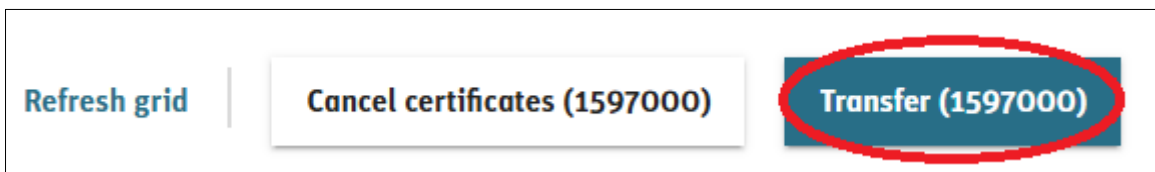
⁵ GGCS takes no responsibility for the process of adding any information to RGGOs once they have been exported. The DENA website can be accessed here: <https://www.dena.de/projekte/biogasregister/>

(f) Initiating the Transfer

Navigate to the **Certificates** section of your G-REX account and **select the eligible bundle of RGGOs** you wish to transfer.

Certificate bundle	Account	Issuer	Energy source	Technology	Production period						
<input checked="" type="checkbox"/>	1 597 000 kWh	Active	[redacted] Default Account	GB	04/12/2023	GGCS Biomethane	GGCS Biomethane RGGO	Biomass (Unspecified) Classification (Residue)	Anaerobic digestion	30/06/2023	29/09/2023

Then click the **Transfer** button:



(g) Designating the Volume

Input the **Transfer volume** of the bundle you wish to transfer:

Transfer Certificates [X]

VOLUME

Selected volume: 1597000 kWh Transfer all selected certificates

Volume Percentage

Transfer volume * Unit *

NB: The ERGaR CoO Scheme and receiving registries operate in MWh so you MUST transfer whole thousands of kWh which will be converted into MWh during the transfer process. Failure to do so will mean that the proposed transfer is rejected and will have to be resubmitted, thus slowing down the transfer timeframes.

Note that Transfer volume box will give you three decimal places after a comma – in the example above the value being transferred is 500,000 kWh, equalling 500 MWh.

(h) Nominating the Receiver

RECEIVER

Domain *

Germany Biogas - DENA

Enter new account holder and account number ⓘ

Account Holder *

Berlin Energy Trading

Account *

U1288 - ERGAR_GAS

Enter account number/ member code ⓘ

U1288

Set the **Domain** to **Germany Biogas – DENA**.

Tick the box to **Enter account holder/member code**

Enter the details of the account. You must input the **DENA Company ID** starting with the letter U followed by four digits e.g. U1234.

Select **Validate account number** and check that the **Account Holder** and **Account** details are as expected.⁶

The **Account Holder** name should be the name of the organisation you are transferring to e.g. Berlin Energy Trading GmbH.

The **Account** field should contain the **DENA Company ID** starting with the letter U followed by four digits e.g. U1234.

You must provide a valid DENA Company ID, otherwise GGCS will reject the transfer.

⁶ If RGGOs have not previously been exported to this account then the **DENA Company ID** will not be validated and you will need to enter the **Account Holder** name and **Account** values manually.

Transfer Time

You can then submit the transfer immediately, or schedule it for a later date.

TRANSFER TIME

Transfer now

Schedule transfer

GGCS will then initiate the transfer on the ERGAR CoO Scheme platform and DENA will receive a notification.

DENA will check that the details of the transfer conform with their rules and processes and the target trader will be informed about the RGGOs they are being offered from a GGCS account.

If the target trader accepts the offer GGCS will be informed and then the RGGOs will be exported and the RGGO Cancellation Fee will be applied.

You will not receive any notification from GGCS of the completion of a transfer. Depending on the processes of DENA, the target trader may receive a notification that the RGGOs are now active in their account.

We aim for transfers to be completed within 10 working days of receiving the request; however, ERGAR CoO Scheme participants do not offer any guarantees on timing of transfer completion and traders should take a cautious approach. The transfer process is not automated, and timelines may be affected on the GGCS side, or the receiving registry's side, by levels of staff availability, or technical issues.

4.3 Transferring RGGOs to Pronovo – Switzerland

(a) Criteria required

All RGGOs must meet Criteria 1, 2, and 3 to be valid for transfer. That mean that a DVS must have been provided to the GGCS by the Producer covering the RGGOs being exported.

(b) Energy Source label

You can transfer RGGOs that contain the following standard Energy Source labels that the GGCS records when issuing RGGOs for NDRHI or GGSS-supported gas:

- **Biomass (Unspecified) Classification (Residue)**
- **Biomass (Unspecified) Classification (Waste)**

Our understanding at the date this guidance was published is that Pronovo are able to include the Energy Source label into their certificates. You may wish to contact bt@pronovo.ch for further information and we encourage you to carry out a “test” transfer of a small number of MWh to ensure you are happy with how this data field will appear in the Pronovo certificate.

Note that RGGOs with an energy source label of **Biomass (Unspecified) Classification (Product/Co-Product)** cannot be transferred.

(c) Expiry date considerations

At the time of publication of this guidance Pronovo certificates expire 18 months after the date of issue.

(d) Fees payable

RGGOs will be recorded as exported from the GGCS and the normal RGGO Cancellation Fee ([see here](#) for current fee levels) will apply. GGCS is not aware of Pronovo’s fee structure.

(e) Status of RGGOs

We are not aware of the status of imported RGGOs in the Pronovo system. Participants should contact Pronovo directly for further details.

Neither GGCS, ERGaR, nor Pronovo offer any assurance on the validity of transferred RGGOs to be used for compliance with any regulations, subsidies, or support schemes in operation in Switzerland, or any other country.

NB: The ERGaR CoO Scheme and receiving registries operate in MWh so you MUST transfer whole thousands of kWh which will be converted into MWh during the transfer process.

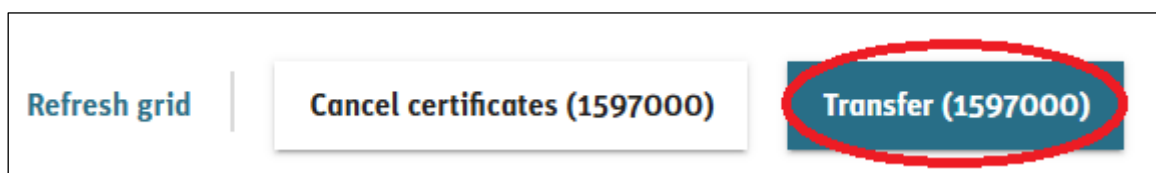
Failure to do so will mean that the proposed transfer is rejected and will have to be resubmitted.

(f) Initiating the Transfer

Navigate to the **Certificates** section of your G-REX account and **select the eligible bundle of RGGOs** you wish to transfer.

Certificates														
Certificate bundle				Account		Issuer				Energy source		Technology	Production period	
<input type="checkbox"/>	Volume	Unit	Status	Account number	Account name	Issuing country code	Issue date	Standard	Trading schemes	Energy source name	Technology name	Production start date	Production end date	
<input checked="" type="checkbox"/>	1 597 000	kWh	Active	[REDACTED]	Default Account	GB	04/12/2023	GGCS Biomethane	GGCS Biomethane RGGO	Biomass (Unspecified) Classification (Residue)	Anaerobic digestion	30/06/2023	29/09/2023	

Then click the **Transfer** button:



(g) Designating the Volume

Input the **Transfer volume** of the bundle you wish to transfer:

Transfer Certificates

VOLUME

Selected volume: 1597000 kWh Transfer all selected certificates

Volume Percentage

Transfer volume * Unit *

NB: The ERGaR CoO Scheme and receiving registries operate in MWh so you MUST transfer whole thousands of kWh which will be converted into MWh during the transfer process. Note that Transfer volume box will give you three decimal places after a comma – in the example above the value being transferred is 500,000 kWh, equalling 500 MWh.

Failure to do so will mean that the proposed transfer is rejected and will have to be resubmitted.

(h) Nominating the Receiver

RECEIVER

Domain *

Switzerland Biogas - Pronovo

Enter new account holder and account number ⓘ

Account Holder *

Example Swiss Trader

Account *

76DRF777AS ERGAR_GAS

Enter account number/ member code ⓘ

76DRF777AS Validate account number

Set the **Domain** to **Switzerland Biogas – Pronovo**

Tick the box to **Enter account holder/member code**.

Enter the detail of the account into the **Account Number/Member code** field, being a ten character code of letters and numbers e.g 976HJG88AS

Select **Validate account number** and check that the **Account Holder** and **Account** details are as expected⁷.

The **Account Holder** name should be the name of the organisation you are transferring to e.g. Example Swiss Trader.

The **Account** field should contain the **Account Number** composed of the ten characters you entered into the box.

⁷ If RGGOs have not previously been exported to this account then the **Account Number** will not be validated and you will need to enter the **Account Holder** name and **Account** values manually.

(i) Transfer Time

You can then submit the transfer immediately, or schedule it for a later date.

The screenshot shows a dialog box titled "TRANSFER TIME". It contains two radio button options: "Transfer now" (which is selected, indicated by a green dot) and "Schedule transfer". At the bottom of the dialog, there are two buttons: "Close" on the left and "Transfer" on the right.

GGCS will then initiate the transfer on the ERGAR CoO Scheme platform and Pronovo will receive a notification.

Pronovo will check that the details of the transfer conform with their rules and processes and the target trader will be informed about the RGGOs they are being offered from a GGCS account.

If the target trader accepts the offer GGCS will be informed and then the RGGOs will be exported and the RGGO Cancellation Fee will be applied.

You will not receive any notification from GGCS of the completion of a transfer. Depending on the processes of Pronovo, the target trader may receive a notification that the RGGOs are now active in their account.

We aim for transfers to be completed within 10 working days of receiving the request; however, ERGAR CoO Scheme participants do not offer any guarantees on timing of transfer completion and traders should take a cautious approach. The transfer process is not automated, and timelines may be affected on the GGCS side, or the receiving registry's side, by levels of staff availability, or technical issues.

4.4 Transferring RGGOs to Energinet – Denmark

At the time of publication of this guidance Energinet is not accepting transfers of RGGOs from the GGCS into their registry. The reason for this restriction is that Energinet is an appointed Issuing Body under the terms of RED II and they will not accept transfers from registries which do not share that status.

For such transfers to take place in the future the UK and the EU would need to enter into a mutual recognition agreement as envisaged in Article 19 of RED II.

4.5 Transferring RGGOs to SPP Distribúcia – Slovakia

At the time of publication of this guidance SPP Distribúcia is not accepting transfers of RGGOs from the GGCS into their registry. The reason for this restriction on transfers is that SPP Distribúcia is an appointed Issuing Body under the terms of RED II and they will not accept transfers from registries which do not share that status.

For such transfers to take place in the future the UK and the EU would need to enter into a mutual recognition agreement as envisaged in Article 19 of RED II.

4.6 Transferring RGGOs to VertiCer – Netherlands

At the time of publication of this guidance VertiCer is not accepting transfers of RGGOs from the GGCS into their registry. The reason for this restriction on transfers is that VertiCer is an appointed Issuing Body under the terms of the second Renewable Energy Directive (RED II) and they will not accept transfers from registries who do not share that status.

For such transfers to take place in the future, the UK and the EU would need to enter into a mutual recognition agreement as envisaged in Article 19 of RED II.

4.7 Information transferred when exporting RGGOs from the GGCS to other registries

The GGCS will transfer the following information represented within the RGGOs in our Registration Database:

- Start date of injection period (year-month-day)⁸
- End date of injection period (year-month-day)
- Name of Producer
- MWh being transferred⁹
- If the measuring of the biomethane injected was Nett or Gross
- If Production Support was received
- Issuing Date of RGGOs
- Expiry Date of RGGOs
- Energy Source e.g. biomass feedstock classification as waste, residue, or product

GGCS may also transfer related information about the Gas Producer including:

- The address of the Gas Producer
- Commissioning date of the Gas Producer
- Production Capacity of the Gas Producer
- The GSRN number allocated to it on G-REX
- That the gas was injected into the grid
- If the plant received Investment Support

Information on the “subsidy or other criteria met” and related GHG emissions or on sustainability schemes e.g. ISCC, are not generally transferred but we may be able to upon request. Contact us for further information at info@greengas.org.uk. **Not all of data fields sent by GGCS may appear in the Certificates issued by the receiving registry (see below). We recommend transferring a small number of MWh to test that a transfer to another register will meet your requirements.**

⁸ Start and End dates are the dates the Gas Producer sets for their NDRHI or GGSS reporting periods and may vary by +/- three days from the dates that the actual meter readings are taken.

⁹ Note that GGCS issues RGGOs in kWh, so they must be sent in batches of 1,000 kWh as other registries operate in MWh.

4.8 Information incorporated into the RGGOs in the receiving registry

The RGGOs that will result from a transfer from GGCS to another registry will include:

- Start date of injection period (year-month-day)
- End date of injection period (year-month-day)
- Name of Producer
- MWh being transferred

Other transferred information may or may not be incorporated and displayed within Registration Databases or on Cancellation Statements.

Details of our current understanding of the type of information incorporated by each registry are provided in this guidance document. These must be confirmed by the relevant registries and we recommend that traders make a “test” transfer for a small number of MWh to establish for themselves if all data fields they require will appear in the receiving registry.

GGCS encourages its participants to pay particular attention to the following data points.

(a) Energy Source label

Depending on which registry the RGGOs are transferred to, information on the classification e.g. product, waste, residue, of the feedstock used in the biomethane production process (the “energy source”) may or may not be accepted, and may or may not be shown within RGGOs and associated Cancellation Statements.

(b) GHG information

GGCS is the only registry to display, as standard, a GHG value on Cancellation Statements, linked to the fact that biomethane has met the NDRHI or GGSS sustainability criteria. By default, this is stated as a threshold e.g. less than 125 gCO₂/MWh, but an actual number may also be supplied.

DENA has accepted a trial run of imports from the GGCS which have included actual or GHG threshold numbers but you should contact them for further information and start with a trial transfer if you wish to transfer this data field.

(c) Expiry Dates

There are a range of expiry systems in place and expiry dates may be added, changed, or removed from RGGOs when they are transferred.

5. IMPORTS – RGGOS TRANSFERRED FROM OTHER REGISTRIES TO THE GGCS

GGCS members should contact the relevant source registry for guidance on how to initiate a transfer request. Once a request is made to transfer RGGOs into a Trader account in the GGCS registry, we will receive that request via the ERGaR CoO Scheme.

We will check that the request complies with our rules and processes and contact the target trader (by email) to inform them that RGGOs are being offered to them.

If the GGCS member accepts this offer, we will then process and complete the transfer, the RGGOs will be cancelled or otherwise deactivated from the source registry, and then will be transferred to the target GGCS account.

GGCS is ready to accept transfers of RGGOs from any other registry that is part of the ERGaR CoO Scheme.

5.1 Information included in imported RGGOs

The G-REX import function is currently limited in the data fields that are included in the imported RGGOs. That means that imported RGGOs will contain information on;

- The kWh volume of the bundle
- The Production Device name
- The start date of the production period
- The end date of the production period
- The “earmark” i.e. if production support has been received.
- When the production device became operational (the commissioning date)
- The date the RGGOs were originally issued
- The energy source of the production, **but it will always show as Renewable/Gaseous regardless of the information received from the sending registry.**¹⁰

¹⁰ That means the imported RGGOs will not contain any detailed energy source (feedstock information). GGCS are currently offering to confirm via email with traders and end-use consumers the energy source information received via the ERGaR CoO Scheme. In order to do so, please liaise with the Team on info@greengas.org.uk.

5.2 information not included in imported RGGOs

GGCS RGGOs have a range of labels when issued for UK injected biomethane and before any export has taken place. The following will not be shown for imported RGGOs even if those RGGOs were originally issued for UK injected gas.

- Producer Address - only the producer name will appear in the imported RGGOs, without an address detailing the City, Postcode and Country.
- Capacity gas production e.g. 1000 kW
- Carbon Capture GHG credit applied e.g. Yes, No, Unspecified.
- Manure GHG credit applied e.g. Yes, No, Unspecified.
- Dissemination Level e.g. Injected to grid
- GHG emission produced e.g. 25.24 gCO₂/MWh
- GHG Threshold met e.g. >125 gCO₂/MWh
- Production Measurement Type e.g. Nett or Gross
- Subsidy or other criteria met e.g. naturemade, Green Gas Support Scheme
- Sustainability Scheme name e.g. ISCC- EU
- Sustainability Scheme certificate start date e.g. 01/01/2025
- Sustainability Scheme certificate end date e.g. 31/12/2025
- Unique Number of linked Proof of Sustainability e.g. POS4566849-001
- Link to Proof of Sustainability e.g. www.dropbox/29038938928

(a) Expiry dates

GGCS will apply our standard expiry date system. If the RGGOs being imported are not valid under that system, we will reject the transfer. If the RGGOs being imported are approaching (within 30 days of) their expiry date according to the GGCS system, we will discuss the risk that the RGGOs will be “expired on arrival” with the relevant GGCS member before proceeding with the transfer process.

(b) Fees

No fees will be charged by the GGCS for any aspect of the import process. The registry from which the RGGOs are being sent may have applicable charges.

(c) Status of imported RGGOs

The GGCS and other ERGaR CoO Scheme participants offer no assurances on the use and recognition of transferred RGGOs.

5.3 Requirements for RGGOs imported from DENA

If the RGGOs relate to gas injected in Germany, RGGOs must have been issued in respect of gas that an independent auditor has confirmed meets DENA's criteria related to:

- a) use of biomass (Criteria 1b or 1b or 3)
- b) methane emissions (Criteria 8 or 21 or 38)
- c) electricity consumption for upgrading (Criteria 9)
- d) use of renewable process heat (Criteria 10 or 22)

DENA will issue more detailed guidance, and they can be contacted at: support@biogasregister.de.

Note that the information we incorporate into our RGGOs via the import process does not allow for any information related to mass balance or book and claim, or any information related to Voluntary Scheme certification e.g. ISCC 8080/Better Biomass proof of sustainability information.

5.4 Requirements for RGGOs imported from AGCS

We do not currently have any requirements for RGGOs imported from AGCS for gas injected in Austria.

Note that the information we incorporate into our RGGOs via the import process does not allow for any information related to mass balance or book and claim, or any information related to Voluntary Scheme certification e.g. ISCC 8080/Better Biomass proof of sustainability information.

5.5 Requirements for RGGOs imported from VertiCer

We do not have any requirements for RGGOs imported from VertiCer.

Note that the information we incorporate into our RGGOs via the import process does not allow for any information related to mass balance or book and claim, or any information related to Voluntary Scheme certification e.g. ISCC 8080/Better Biomass proof of sustainability information.

5.6 Requirements for RGGOs imported from Energinet

We do not have any requirements for RGGOs imported from Energinet.

Note that the information we incorporate into our RGGOs via the import process does not allow for any information related to mass balance or book and claim, or any information related to Voluntary Scheme certification e.g. ISCC 8080/Better Biomass proof of sustainability information.

5.7 NDRHI Annual Sustainability and GGSS Annual Sustainability Audit Reports

The NDRHI and GGSS are subsidies offered by the UK government for injecting biomethane into the UK gas grid. Full details of both schemes and their sustainability requirements are available on the Ofgem website¹¹.

A requirement of the NDRHI and GGSS is that biomethane producers submit an annual audit report to Ofgem, written by an independent third party according to the requirements of the ISAE3000 standard for non-financial reporting and uses the principle of “limited assurance”¹².

Within this report are details on the plant’s location, capacity, and processes for recording its inputs and outputs. The report author will have visited the site in person during the year or in previous years to confirm these details.

Providing these reports is one way to meet Criteria 1 when exporting RGGOs.

(a) Availability of NDRHI and GGSS reports

Be aware that NDRHI and GGSS reports are only commissioned 12 months from the start of the plant injecting biomethane and the requirement from Ofgem and the GGCS is that this document provided within 3 months from that date¹³. Plants will then commission this report annually on the same reporting cycle. For example:

- A Gas Producer commissions and starts injecting biomethane on 24 April 2024
- Its annual compliance period ends on 23 April 2025
- It is expected to submit its NDRHI or GGSS Annual Sustainability Report to Ofgem and the GGCS by 23 July 2025
- Its next annual compliance cycle is from 24 April 2025 to 23 April 2026

Therefore, if a plant has been operating for 15 months or more, it is likely that Criteria 1 has been met. However, that is not certain as there can be delays and you cannot be certain that the report has not highlighted issues that are awaiting resolution and are affecting the validity of the RGGOs.

GGCS does not offer any guarantees or assurances regarding the availability of these reports and the Registration Database and the RGGOs within it are not marked to indicate if they have been provided by a particular Gas Producer.

In the first instance, Traders should seek confirmation from the Gas Producer that they have provided these documents to the GGCS. If you are not able to confirm this directly with the Gas Producer, you

¹¹ <https://www.ofgem.gov.uk/publications/non-domestic-rhi-main-guidance> and <https://www.ofgem.gov.uk/publications/green-gas-support-scheme-guidance>

¹² <https://www.icaew.com/technical/audit-and-assurance/assurance/process/scoping/assurance-decision/limited-assurance-vs-reasonable-assurance>

¹³ GGCS cannot guarantee that this requirement is met by a Gas Producer. Reports are often submitted late.

should contact the GGCS Scheme Administrator (info@greengas.org.uk) and we will be able offer confirmation.

5.8 GGCS Data Verification Statement

All Gas Producers participating in the GGCS are obligated to verify the data they submit to the GGCS on an annual basis.

To conduct this verification GGCS provides a template Data Verification Statement (DVS). The Gas Producer employs an independent third party to complete that statement and submits it to the GGCS.

More details on the content of a DVS and process for completing one are available in the [GGCS Guidance Document folder](#) – see documents 1 and 1h.

(a) Availability of the GGCS DVS

Gas Producers must complete a DVS annually, but not necessarily on a calendar basis. Producers are not required complete their DVS in line with their NDRHI or GGSS compliance cycle (see above), but they generally do so.

The GGCS requires that a DVS is provided three months after the end of the annual period covered; however, submissions may be late and the GGCS offers no guarantees that they will have been made available to us.

From time to time, a DVS will identify errors in the number and type of RGGOs that have been issued which may cause delays and affect your ability to transfer RGGOs.

In the first instance you should contact the relevant Gas Producer who can confirm if the RGGOs you wish to transfer are covered by a DVS, and that the statement has not called into question any of the data underlying the RGGOs.

A second source of information is “GGCS Guidance Document 7b - Producers Compliance Cycles v1.0 (GGCS Member Access Only)” which shows the expected dates of DVS publication and the compliance cycle they will cover. This document is available on request from the Scheme Administrator.

Thirdly, you may send a list of the RGGOs you wish to transfer to transfer@greengas.org.uk, and the Scheme Administrator will confirm if a DVS has been received and Criteria 3 has been met.

Producers are free to complete DVSs outside their annual cycle in order to meet Criteria 3 and make RGGOs eligible for transfer.

(b) International Sustainability and Carbon Certification (ISCC) Audit

Details of the ISCC system are available here: <https://www.iscc-system.org/>.

In order to be certified under the ISCC system, a Gas Producer will employ an auditor who will assess if they meet the relevant criteria.

The plant will be listed on the ISCC website, and a Certificate and Audit will be available to download.

The certification and recertification process are annual and may or may not follow calendar years.

5.9 Summary and recap of key points

- Not all RGGOs are eligible to be transferred to or from other registries.
- The relevant criteria must be met, and it is the responsibility of those making transfer requests to ensure that they are.
- Not all ERGaR CoO Scheme members accept transfers and those that do may have particular requirements that need to be considered.
- RGGOs are not a standardised product, and different ERGaR CoO Scheme members handle different data points (e.g. energy source labels) differently, resulting in some information being “lost” during transfers.
- The GGCS intends to participate in the ERGaR CoO Scheme on an ongoing basis, but we cannot guarantee that we will, or that during our participation in the Scheme other registries will accept transfers from the GGCS.
- In particular there is a risk that the UK’s status as a third country outside the European Union will impact on the ability of RGGOs to be moved between the GGCS and other registries, either via the ERGaR CoO Scheme or by any other method.
- Before proceeding with any transfer requests and/or entering into any agreements with counterparties based on the transfer of RGGOs between GGCS and other registries, you should read the disclaimers within this guidance document and contact the GGCS Administrator with any questions arising.

5.10 Frequently Asked Questions

(a) Why does a Gas Producer need to submit a DVS before RGGOs can be transferred?

GGCS operates an ex-post auditing system, where data is self-reported and then verified at the end of a 12-month period. Other registries e.g. DENA, have an ex-ante auditing system, where verification is made before a RGGO is issued (or given tradable status). RGGOs imported into these registries must conform with this ex-ante auditing requirement.

(b) Is there any way to know if the DVS has been provided before buying RGGOs from a counterparty?

RGGOs are not marked as being covered by a DVS or not. Your counterparty may be able to offer you an assurance based on information received from the Gas Producer (or if they are the Gas Producer of the RGGOs in question), that they have submitted a DVS for the relevant period.

You can find out more about each producer's expected compliance cycle in "GGCS Guidance Document 7b - Producers Compliance Cycles v1.0 (GGCS Member Access Only)" which shows the expected dates of DVS publication and the compliance cycle they will cover. Access to this document is available to Scheme Participants upon request – contact info@greengas.org.uk.

(c) How can I see if the RGGOs currently in my account have been covered by a DVS?

If you have their details, you can contact the relevant Gas Producer and ask for details about their compliance cycle, or you can contact the counterparty (who may not be the Gas Producer) from whom you received the RGGOs to see if they hold that information.

You can find out more about each producers expected compliance cycle in "GGCS Guidance Document 7b - Producers Compliance Cycles v1.0 (GGCS Member Access Only)" which shows the expected dates of DVS publication and the compliance cycle they will cover. Access to this document is available to Scheme Participants upon request– contact info@greengas.org.uk.

You can also contact the GGCS Administrator with a list of RGGOs for which you want to confirm if Criteria 3 (DVS provision) has been met.

(d) Can I work out from the date of the RGGOs if a DVS will have already been provided?

Where the start date of the injection period is over 15 months in the past, then the RGGOs will be part of the annual compliance cycle for which the DVS should have been provided (12-month compliance cycle plus 3 months to conduct and submit the DVS).

For example, RGGOs with an injection start date of 01 Jan 2021 could be at the start of an annual compliance cycle that ends on 31 Dec 2021. The DVS would be due on 31 March 2022.

You can find out more about each producer's expected compliance cycle in "GGCS Guidance Document 7b - Producers Compliance Cycles v1.0 (GGCS Member Access Only)" which shows the expected dates of DVS publication and the compliance cycle they will cover. Access to this document is available to Scheme Participants upon request – contact info@greengas.org.uk.

However, DVS submission may be late, or the DVS may have highlighted problems with the RGGOs issued that make them ineligible to be transferred. You should not assume that Criteria 3 has been met only based on the vintage of the RGGOs.

(e) I'm making a transfer. How long before the RGGOs will "arrive" in DENA (or another registry)?

We aim to make the initial transfer request to DENA with 5 working days of receiving a transfer request form.

DENA then need to process that request and notify the trader of the request. After the trader accepts, DENA notify GGCS and GGCS cancel the RGGOs and provide the Cancellation Statement to DENA. This can take up to 5 working days.

Timelines can be affected by staffing levels at GGCS and DENA e.g. holidays and sick leave. We do not guarantee that the RGGOs will arrive within 10 working days.

The same timelines apply to RGGOs exported to other registries.

(f) Why isn't all the information in a RGGO imported into the DENA system?

RGGOs registries did not develop according to a unified standard and not all registries have the processes or IT systems to include information on GHG values or Energy Source labels. It is the responsibility of those making transfers to understand the complexity of the RGGO transfer process and we recommend making test transfers of small volumes where you are unsure of the outcome of such transfers.

(g) Has Brexit affected the export of RGGOs to EU-based registries?

Because the UK is not in the EU, has not implemented RED II as a third country, nor signed a mutual recognition agreement with the EU. GGCS RGGOs are not recognised as GoO according to RED II and will not be treated as such by other registries. This may lead to restrictions on the import and export of RGGOs with other ERGaR CoO Scheme members. The GGCS will seek to keep our members informed of developments in this space and we encourage our members to account of possible future disruptions to their agreements with their counterparties.