

Summary of the assessment of national guarantees of origin for electricity produced from renewable sources (GO) and disclosure systems for the purpose of decisions about the recognition of imported GO
On behalf of the German Federal Environment Agency

Belgium (Federal State)



Introduction

The German Federal Environment Agency (UBA) is currently assessing general questions on whether guarantees of origin for electricity produced from renewable sources (GO) from other Member States of the European Union and further states can be recognized in the course of Article 15 of the Directive 2009/28/EC. The evaluation of the legal and practical set-up of the national systems for GO and electricity disclosure is performed by a consortium of external consultants (Öko-Institut e. V.) and lawyers (Becker Büttner Held Rechtsanwälte Wirtschaftsprüfer Steuerberater PartGmbH (BBH)).



General

As of 24.01.2018, the assessment of available information regarding system-related issues does not result in well-founded doubts about accuracy, reliability or veracity of GO issued in and imported from Belgium, Federal State level. Therefore, there seems to be no reason at present for non-recognition of such GO in accordance with Article 15 Directive 2009/28/EC.

Specifics

In Belgium, the competences regarding renewable energy are split between the federal government and the three regions (Walloon Region, Flanders, Brussels). The federal government is thereby responsible for offshore wind installations, while the regions deal with renewable energy plants within their respective territories.

The GO issued by the Belgian federal regulator for renewable energy installations within its area of competence (i.e. offshore wind plants) **meet all the criteria mentioned in Article 15** Directive 2009/28/EC. The GO are issued in **standard unit of 1 MWh**.

On federal level, there is no electricity disclosure system, as such falls within the competences of the three regions (Walloon Region, Flanders, Brussels). Still, the purpose of the federal GO is to allow disclosing the origin of the renewable electricity generated in the federally regulated offshore wind parks in the context of **electricity disclosure**.

There is **no evidence that GO might be used to meet the binding renewable energy targets** imposed by Article 3 Directive 2009/28/EC, nor to impact the calculation of the gross energy consumption.

GO expire 12 months after the end of the production period, which is set at one month. Belgian legislation as well as the EECS Rules safeguard that federal Belgian GO are **only used once**.

The GO are issued by the federal regulator, CREG, as the only competent issuing body on federal level. While the regions have their own issuing bodies, the competences do not overlap and no danger of double issuance etc. is

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	<p>apparent.</p> <p>The federal rules, including the EECS Rules, safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO in the electronic register. There is no indication that CREG or any other relevant party is acting in violation of those rules. The electronic EECS-compatible registry is connected to the German GO registry via the AIB Hub. CREG as a regulatory institution can be considered independent from production, trade and supply.</p> <p>Issuing takes place based on meter readings for net production. Production devices are audited when being registered, with the possibility of later audits to follow. CREG verifies the production data with help of the measuring bodies, reading out the meters, and can request more information if deemed helpful.</p> <p>The rules applied in Belgium on federal level include provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Further, there are remedies against fraud etc. in place, both specific to GO and in the Belgian Criminal Code.</p> <p>Federal Belgian GO include all the information required by Article 15 (6) of the Directive.</p> <p>Thus, for the moment and regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of federal Belgian GO. As a conclusion, they may generally be recognised.</p> <p>Critical issues None.</p> <p>Reasons for non-recognition None.</p>
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Please note

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