



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

Ireland	
	<p>Introduction</p> <p>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 PartGmbB (BBH)).</p>  <p>General</p> <p>As of 06.02.2018, the assessment of available information regarding system-related issues does not result in well-founded doubts about accuracy, reliability or veracity of non-biomass RES-E GO issued in and imported from Ireland. Therefore, there seems to be no reason at present for non-recognition of such GO in accordance with Article 15 Directive 2009/28/EC.</p> <p>Specifics</p> <p>Irish GO – at least for non-biomass RES-E – meet all the criteria mentioned in Article 15 Directive 2009/28/EC. Irish GO are issued in the standard unit of 1 MWh. The only purpose of GO is electricity disclosure, where renewables are clearly distinguished from other electricity sources. In the Irish disclosure system, the default residual mix is calculated by SEMO, the Irish Competent Body, whereas RES-E volumes are only taken into account based on expired GO. Supported RES-E volumes are tracked by separate power purchase agreements (PPAs) and not eligible for issuing GO. Thus, double counting of the attributes which are represented by a GO with any other accounting instrument can be excluded. It is legally clarified that GO could not be used to meet the binding renewable energy targets imposed by Article 3 Directive 2009/28/EC, and there is no evidence that GO might impact the calculation of the gross energy consumption. GO expire 12 months after the end of the production period, while issuing takes place on a monthly basis.</p> <p>Irish legal regulations as well as the EECS Rules which are applied by the market operator SEMO safeguard that Irish GO can be used only once. SEMO is the only competent body in Ireland for GO. The rules in place in Ireland, and here in particular the EECS Rules which are applied, safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO and the electronic register. SEMO as market operators confirms to be independent from production, trade and supply.</p> <p>Issuing takes place based on meter readings for net production, which are submitted electronically. Production devices are audited when being registered by SEMO and by Production Registrars, with a re-audit each five</p>

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	<p>years. A comparison with the plant information for supported production takes place on an annual basis. For biomass no sufficient regulation for the issuing of GO is currently in place and publicly available. SEMO has confirmed that no biomass GO are issued since Juli 2016, and that any such issuing and possibly also export will only take place after sound approval by the AIB.</p> <p>Irish regulations include provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Irish GO include all the information required by Article 15 (6) of the Directive. Therefore, for the moment and regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of Irish GO from non-biomass sources, so that it can be concluded that these can generally be recognised.</p> <p>Critical issues</p> <p>For biomass no sufficient regulation for the issuing of GO is currently in place and publicly available. SEMO has confirmed that no biomass GO are issued since Juli 2016, and that any such issuing and possibly export will only take place after sound approval by the AIB.</p> <p>Reasons for non-recognition</p> <p>Relying on this confirmation of SEMO that no Irish biomass GO currently exist or will be issued, the lack of sufficient regulation with respect to biomass does not substantiate a well-founded reason for non-recognition of Irish GO. This will have to be reassessed after the implementation of new regulation and the respective possibility that biomass GO are issued in Ireland.</p> <p>In the meantime, it should be considered whether technical measures can be implemented in the registry in order to explicitly prevent biomass GO from Ireland from being imported.</p>
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Please note

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