

# Summary of the evaluation of national systems for guarantees of origin for electricity from renewable sources (GO) and for electricity labelling for the purpose of a decision on the recognition of imported guarantees of origin on behalf of the Federal Environment Agency (UBA)

## Republic of Serbia

### Introduction

The German Federal Environment Agency (UBA) currently examines whether guarantees of origin for electricity from renewable sources (GO) from other Member States of the European Union and other states can in principle be recognised under Article 19 Directive (EU) 2018/2001 (RED II). The evaluation of the legal and practical implementation of the national systems for guarantees of origin and for electricity disclosure is supported by a consortium of external contractors (Öko-Institut e. V. and Becker Büttner Held PartGmbH (BBH)).

### General

As of 16 October 2023, the assessment of the available information on system-related issues does not lead to general reasonable doubts about the reliability or veracity of GOs issued in and imported from Serbia, so that, in accordance with Art. 19 RED II, there currently appears no reason not to recognise Serbian GOs.

### Specifics

Serbia is not a member of the EU. However, it meets the criteria set out in Art. 19 (11) RED II for the recognition of GOs from third states. Both Serbia and the EU are contracting parties to the Founding Treaty of the European Energy Community (FTEEC). Art. 20 of this treaty makes the RED II part of the *acquis*, i. e. the legal acts concerning renewable energy applicable pursuant to the FTEEC, that the contracting parties must comply with. Hence, the EU and Serbia have agreed on the mutual recognition of GOs in the Founding Treaty of the European Energy Community, and the framework for GOs in Serbia is equal to the framework within the EU.

Serbian GOs fulfil (partly with minor restrictions) **all criteria according to Art. 19 RED II**.

GOs are issued for the **standard size of 1 MWh** net electricity generation. In electricity disclosure, renewable sources are clearly distinguished from other electricity sources. **Electricity from renewable sources is exclusively disclosed on the basis of a robust residual mix or on the basis of the GO system**. In Serbia, the share of renewable electricity is even labelled with the relevant specific renewable source, if possible. GOs are only issued to producers of electricity from renewable energy sources who do not receive financial support for their renewable energy. The "privileged producers", i.e. those whose renewable electricity is financially subsidised, are not entitled to obtain GOs.

No GOs are issued for renewable electricity generation from high-efficiency co-generation.

GOs are **not used to achieve the mandatory targets according to Art. 3 RED II**, nor do they affect the calculation of gross energy consumption.

GOs lose their validity 12 months after the end of the production period with regard to their transferability. Afterwards, they are automatically cancelled.

By law, the state transmission system operator is **the only competent body for issuing GOs** (EMS JSC Belgrade). As a transmission system operator, it is responsible for the transmission of electricity but is **independent of production and trade and supply of energy**.

The applicable rules in Serbia ensure **accurate, reliable and fraud-proof issuance, transfer and cancellation of GOs**. There is no indication of a breach of these rules. The electronic register is connected to the AIB HUB and follows the EECS rules. In particular, it is ensured that GOs are used only once, and that the registry technically avoids further use of the GO after cancellation, expiry or export of the GO.

GOs are **issued for the net production of electricity** (excluding self-consumption) used by final consumers. For electricity produced in pumped hydro installations, no GO can be issued. The amount of net production is verified based on **meter readings obtained from the distribution grid operators**. The distribution grid operators are surveilled by EMS JSC Belgrade. The Serbian regulations contain provisions both for the correction of incorrect GOs and for incorrect or outdated registered data of generation plants.

Serbian GOs contain **all the information required by Article 19 (7) RED II**.

Therefore, there are currently no reasonable doubts about the accuracy, reliability or veracity of the Serbian GOs in relation to system-related issues. Thus, Serbian GOs can normally be recognised.

### **Critical aspects**

No explicit exclusion of other electricity labelling systems could be inferred from the legal texts. The assumption that no other system exists despite the lack of respective rules was, however, confirmed by direct information from the national contacts.

The same applies to the exclusion of issuing GOs for self-consumption which is legally not prohibited but according to the information from the national contacts in practice not implemented.

For combustion plants (biomass), there are no stringent measures to verify the correct proportion of different fuels. At present, this is only documented by a self-declaration from the plant operator. However, the practical relevance of this is low, as there currently exist – to our knowledge – no biomass plants in Serbia.

### **Reasons for non-recognition**

None.

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