

## Response to RED II public consultation (16 September 2020)<sup>1</sup>

ENTSOG is the European Association of Gas Transmission System Operators. With this response we would like to propose amendments to Renewable Energy Directive 2018/2001 (RED II) and, by doing so, advocate for Option 4 of the Inception Impact Assessment which is to *'amend RED II to translate into legal measures the actions proposed in other energy strategies of the European Green Deal'*. Our proposals are fully in line with recommendations<sup>2</sup> made during Madrid Forum in June 2019 on behalf of a 'Prime Movers' group of associations.

According to the Inception Impact Assessment *elements emanating from the EU strategies on Energy System Integration (ESI) and Hydrogen (H<sub>2</sub>) should be considered in the revision of RED II*. We fully support this idea and suggest that particular attention should be paid to the proposal to introduce *'a comprehensive **terminology for all renewable and low-carbon fuels** and a **European system of certification of such fuels** based on full life cycle GHG emission savings and sustainability criteria'*.

The Green Deal aims to achieve greater GHG emission reductions across EU, in particular 2030's enhanced target. This could be done via the uptake of renewable and low-carbon gases (e.g. biomethane, 'green' and 'blue' hydrogen, synthetic methane etc.) fostering GHG emission reduction in a timely and cost-efficient manner. Therefore, the revision of RED II as such should give the framework to all gases which demonstrate GHG emission savings and should provide for:

- **a clear and straightforward classification (terminology) of decarbonised and low-carbon fuels**. This would help consumers better understand characteristics and differences between various types of fuels and enable them to make a right choice depending on individual decarbonisation needs and preferences;
- **mandatory issuance of Guarantees of Origin (GOs) to all types of decarbonised and low-carbon fuels which demonstrate GHG emissions savings** (e.g. 'blue' hydrogen). In this case GO issuing should not be the option for Member States (as currently provided for the non-renewable energy in Art. 19(2) of RED II) but should become an obligation. This would also ensure a level-playing field for various types of fuels and technologies used for their production;
- **the use of the GO system as a basis for the European certification system**. GO is an effective European-wide and market-based instrument which provides

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<sup>1</sup> Also available here: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12553-Revision-of-the-Renewable-Energy-Directive-EU-2018-2001/F553370>

<sup>2</sup> Please see here: <https://ec.europa.eu/info/sites/info/files/gie-entsog-recommendations-eu-wide-system-of-certification-and-gos.pdf>

market participants with a trustworthy information about the fuels and their characteristics. The GO systems will be shortly introduced in all EU Member States for the renewable energy and will be based on rules of the GO Standard (EN 16325), which makes GO system a good starting point for construction of a more sophisticated European certification system;

- **indication of information related to GHG emissions/savings and sustainability information (where relevant) in all types of GOs.** Life Cycle Analysis comparable between all energy carriers is needed to allow end-users to make well-informed choices. We believe that market participants should get easy access to this information when it is properly confirmed by dedicated label/certification schemes (e.g. the one mentioned for biomass fuels in Art. 30 of RED II). This will be particularly important for industrial consumers subject to the EU ETS (in the light of the pending reform of the EU ETS Monitoring and Reporting Regulation). Moreover, this link between GOs and other labels/certificates is considered as an effective tool to prevent false or double claims on the origin of energy and is being fruitfully discussed in the CEN fora for revision of the GO Standard.

We hope this contribution will be helpful and remain available to discuss it in more detail.