

BIP Europe
Biomethane Industrial Partnership

Task Force 6 – UA law and EU requirements

Outline

1. Overview of the legal framework

2. Implementation of the new law

3. Sustainability, verifiability and traceability

4. The new law seen from the business and the EU

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Overview of the legal framework

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Content

1. Overview of legal framework for biomethane export
2. Regulation of biomethane export in Ukraine: Law No. 3613-IX
3. Order of the Ministry of Finance No.380
4. Order of the Ministry of Finance No.380: required documentation
5. The list of goods subject to customs clearance by the Energy Customs

1. Overview of legal framework for BM export

1. Customs code of Ukraine No.4495-VI dated 13 March 2012;
2. Law of Ukraine No. 3613-IX dated 20 March 2024 “On amendments to the Customs code of Ukraine and other laws of Ukraine concerning peculiarities of customs control and customs clearance of certain categories of goods”;
3. Law of Ukraine No. 1391-XIV dated 12 January 2001 “On alternative types of fuel”;
4. Order of the Ministry of Finance of Ukraine No. 380 dated 01 August 2024 “On amendments to certain regulatory legal acts of the Ministry of Finance of Ukraine on customs matters”;
5. Order of the Ministry of Finance of Ukraine No. 629 dated 30 May 2012 “On customs formalities for pipeline transport and power lines”;
6. Order of the Ministry of Finance of Ukraine No. 448 dated 20 April 2015 “On approval of the list of goods, customs clearance of which is carried out by the Energy Customs of the State Customs Service of Ukraine”.

2. Law No. 3613-IX (1)

1. Export of biomethane is conducted:
2. following the procedure for natural gas under customs legislation of Ukraine;
3. based on information on biomethane volumes;
4. by the biomethane producers that (i) have an account in the biomethane register and (ii) are connected to the GTS/ GDS using an automatic flow instrument (automatic chromatograph) and a gas metering unit;
5. only in relation to the volumes of biomethane accumulated by the business entity in Ukrainian gas storage facilities at the end of the month preceding the month of export.

2. Law No. 3613-IX (2)

Prior connection to the Union database:

- a periodic customs declaration + a certificate of compliance with sustainability criteria for biomethane;
- an additional customs declaration + a proof of sustainability for the relevant volumes.

After connection to the Union database:

- a periodic customs declaration + information on the account number of the biomethane producer in the biomethane register;
- an additional customs declaration + information on the guarantee of origin of biomethane.

3. Order of the Ministry of Finance No.380

1. Order of the Ministry of Finance of Ukraine No. 380 dated 01 August 2024 “On amendments to certain regulatory legal acts of the Ministry of Finance of Ukraine on customs matters” introduces amendments to:

2. Order of the Ministry of Finance of Ukraine No. 629 dated 30 May 2012 “On customs formalities for pipeline transport and power lines”;

3. The list of goods subject to customs clearance by the Energy Customs of the State Customs Service of Ukraine approved by the Order of the Ministry of Finance of Ukraine No. 448 dated 20 April 2015;

4. The list of departmental classifiers of information on customs matters used in the process of customs declarations approved by the Order of the Ministry of Finance of Ukraine No. 623 dated 29 May 2012.

4. Order of the Ministry of Finance No.380

Required documentation* (1)

No.	Stage I for biomethane export: prior export
1.	a periodic customs declaration
2.	a certificate of compliance with sustainability criteria for biomethane
3.	an act and a scheme of delimitation of balance sheet ownership and operational responsibility of the parties
4.	an act of commissioning of a gas metering unit using a flow chromatograph
5.	an act of acceptance and transfer of the produced biomethane
6.	an act of the Ukrainian gas storage operator on the movement of natural gas and/or biomethane in gas storage facilities

*temporary prior connection to the Union database and recognition of guarantees of origin for biomethane issued in Ukraine

4. Order of the Ministry of Finance No.380

Required documentation* (2)

No.	Stage II for biomethane export: release of biomethane into the customs regime of export
1.	an additional customs declaration;
2.	a proof of sustainability;
3.	a general act of acceptance and transfer of natural gas by carriers;
4.	a certificate of the TSO of Ukraine on the accounting of commercial supplies and withdrawals of natural gas and/or a mixture of gases, biomethane of the customer (biomethane producer).

*temporary prior connection to the Union database and recognition of guarantees of origin for biomethane issued in Ukraine

5. The list of goods subject to customs clearance by the Energy Customs

Biomethane and its code under UCT ZED were added to the List of goods subject to customs clearance by the Energy Customs approved by the Order of the Ministry of Finance of Ukraine No. 448 dated 20 April 2015 (*see Table 1. Amendments to the List of goods subject to customs clearance by the Energy Customs*):

Table 1. Amendments to the List of goods subject to customs clearance by the Energy Customs

Name of goods	Goods code under UCT ZED	Means and ways of moving goods at the border	Customs regimes
Natural gas in gaseous form, **biomethane**, crude oil, anhydrous ammonia	2711 21 00 00, **2711 29 00 00**, 2709 00 90 00, 2814 10 00 00	Pipeline	All customs regimes



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Implementation of the new law

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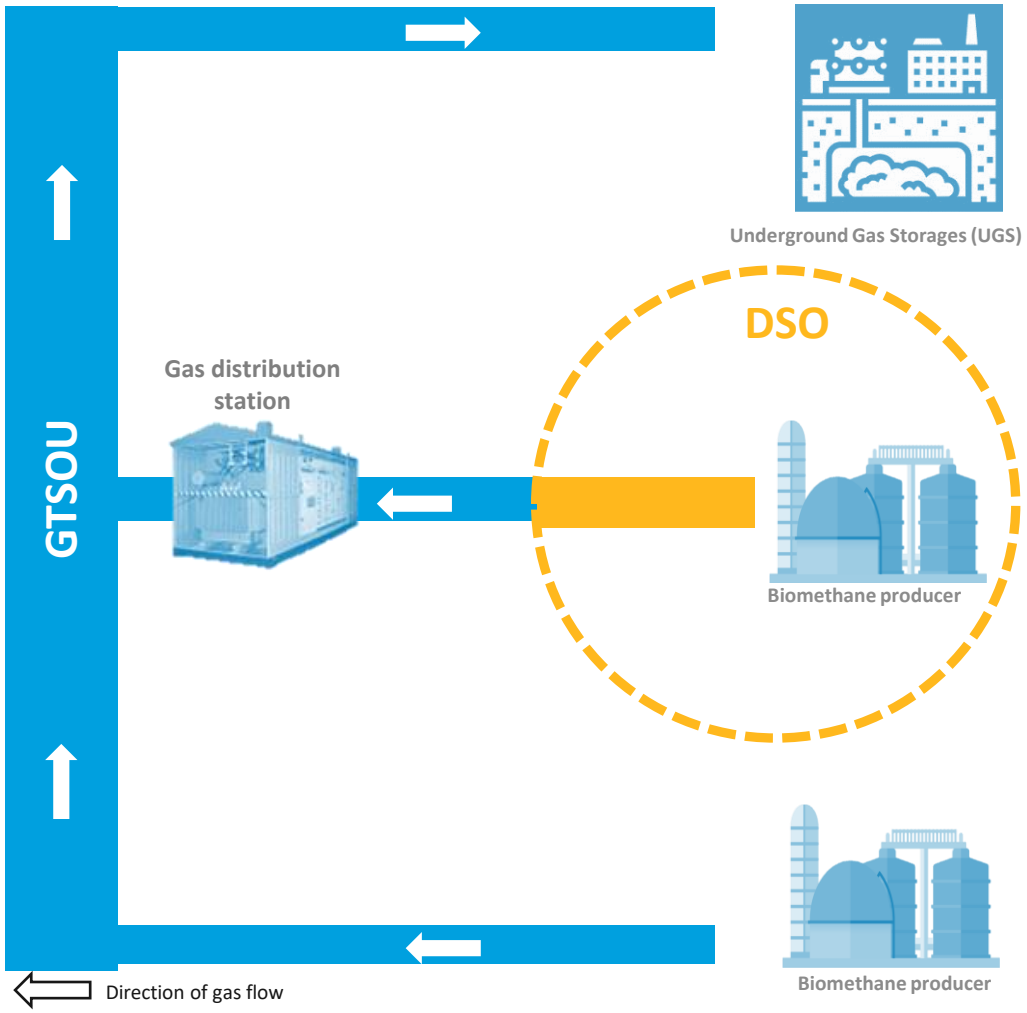
Procedure for biomethane export: implementation of the new law

Biomethane export (in case of ban for gas export): Step 1 – transmission to UGS (month M)

Simplified gas flow diagram



*BMP = biomethane producer

Simplified information flow

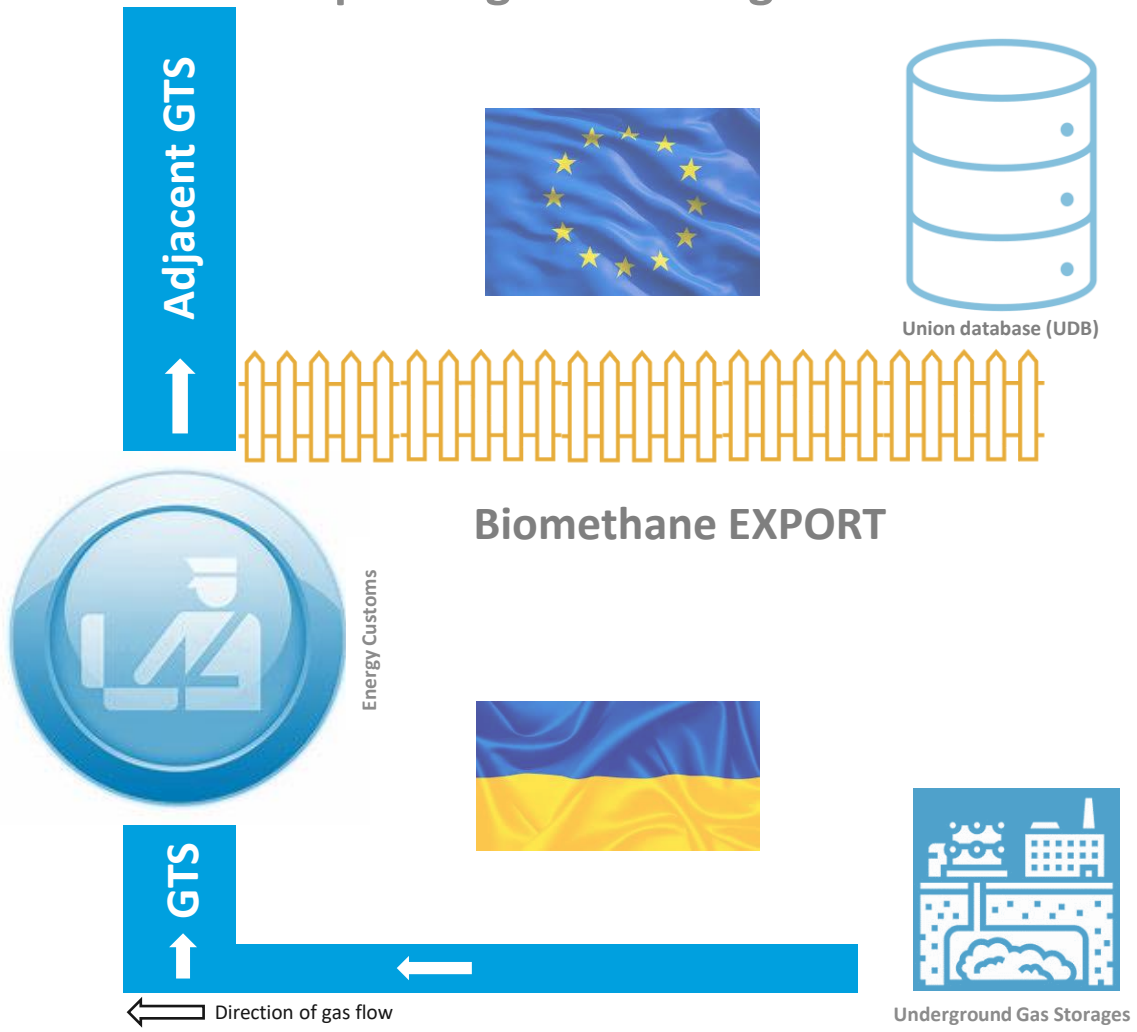
Prerequisites for biomethane commercial injection into GTSOU:

1. BMP receives or **register EIC** in the base of the GTS Operator
2. BMP signs **transmission agreement with GTSOU** and **registers** in GTSOU's **information platform**
3. BMP **books capacity at entri/exit system** of GTSOU

	BMP* connected directly GTSOU	BMP* connected to DSOs
BMP*	**BMP submits GTSOU:** • daily nominations for entry point to GTS and exit point from GTS to UGS; • information on actual amounts of gas injected into GTS (verified by GTSOU's remote access to metering equipment); • monthly protocols on gas flows with GTSOU.	**BMP submits to GTSOU:** • Daily nominations for virtual entry point from GDS to GTS and exit point from GTS to UGS. **BMP submits to DSO:** • information on actual amounts of gas injected into GDS (verified by DSO's remote access to metering equipment); • monthly protocols on gas flows with DSO.
DSO		**DSO submits to GTSOU:** • Information on actual amounts of biomethane physically injected to GDS for virtual entry point from GDS to GTS. • monthly protocols on gas flows with GTSOU.
GTSOU	**GTSOU submits to BMP:** • allocations for the flows at entry point to GTS and at exit point to UGS; • certificate regarding the accounting of commercial injections and withdrawals of biomethane by the BMPr.	**GTSOU submits to BMP:** • allocations for the flows at virtual entry point to GTS and at exit point to UGS; • certificate regarding the accounting of commercial injections and withdrawals of biomethane by the BMP.

Biomethane export (in case of ban for gas export): Step 2 – transmission abroad (month M+1)

Simplified gas flow diagram



*BMP = biomethane producer

Simplified information flow

BMP* connected directly GTSOU/DSO

BMP*

BMP submits to GTSOU:

- daily nominations for entry point from UGS to GTS and cross-border exit point;

SSO

SSO submits to BMP:

- protocol on the movement of biomethane in UGS, recorded in the UGS account of BMP;

GTSOU

GTSOU submits to BMP:

- allocations for the flows at entry point to GTS from UGS and at cross-border exit point;
- certificate regarding the accounting of commercial injections and withdrawals of biomethane by the BMP;
- Protocol of biomethane transfer signed by GTSOU and adjacent TSOs - contains data on the amount of biomethane transported across the Ukrainian border;

BMP submits to Energy Customs:

- Periodic customs declaration and Additional customs declaration;
- Certificate of compliance with the sustainability criteria for biomethane;
- Confirmation of biomethane producer connection to GTS or GDS using chromatograph;
- Protocol of gas flows signed by TSO or DSO (depending on connection points);
- Protocol on the movement of biomethane in UGS, recorded in the UGS account of BMP;
- Proof of Sustainability for biomethane;
- Protocol of biomethane transfer signed by GTSOU and adjacent TSOs - contains data on the amount of biomethane transported across the Ukrainian border;
- Certificate issued by GTSOU regarding the accounting of commercial injections and withdrawals of biomethane by the BMP.

Biomethane Industrial Partnership

Task Force 6

NAFTOGAZ
UKRTRANSGAZ

IMPLEMENTATION OF THE NEW LAW

Cooperation with the SSO of Ukraine

October 17, 2024

AGNETA KUTSELIM
Head of Commercial

UKRAINIAN GAS STORAGES TODAY

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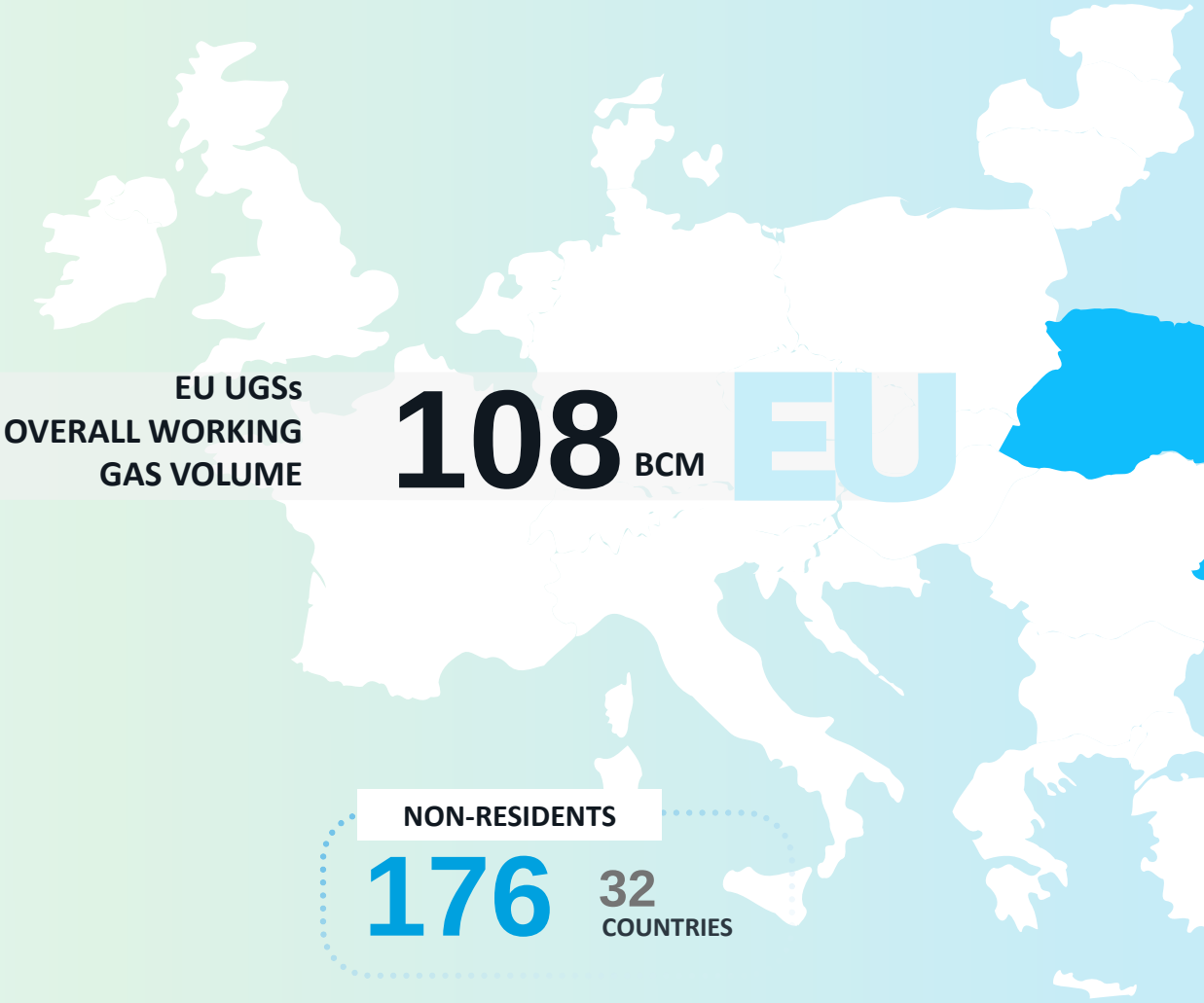

EU UGSs OVERALL WORKING GAS VOLUME

108 BCM



30.95 BCM

UA UGSs OVERALL WORKING GAS VOLUME

NON-RESIDENTS

176

32 COUNTRIES

RESIDENTS

1142

incl **4** BIOMETHANE PLANTS

*source: agsi.gie.eu

Trafigura · EKOZON ENERGY · D.TRADING · Natural Gaz · axpo · DXT COMMODITIES · RWE Vanguard Commodities · SEFE · ERU ENERGY RESOURCES OF UKRAINE · Rosh Resources AG · MET

SSO REGULATION IN UKRAINE

UA SSO is regulated by the National Energy and Utilities Regulatory Commission (NEURC)

› **Law of UA "On the Natural Gas Market"** (Art. 19)

Producers of biogas or other types of gas from alternative sources **have a right to access** GTS/GDS, **UGSs**, LNG installations and be connected to GTS/GDS, subject to compliance with technical and safety requirements in accordance with the law and provided that biogas or other types of gas from alternative sources comply with regulations on natural gas in terms of their physical and technical properties



Storage Activity Regulation

Gas Storage Code

adopted NEURC 30.09.2015
Latest update 03.04.2024



Access to Services Regulation

Standard Storage Agreement

adopted NEURC 30.09.2015
Latest update 03.04.2024



Tariff Regulation

Tariffs for natural gas storage (injection, withdrawal) services

adopted NEURC 30.06.2022

NORMATIVE REGULATION

Biomethane export*

Biomethane export customs processing:

› The Law of UA "On Alternative Fuels"

- **Export of biomethane volumes** transported across the customs border of UA by pipeline transport **may be carried out exclusively in respect of biomethane volumes accumulated by a business entity in UGSs of UA at the end of the month** preceding the month of export (Section VI, clause 1.1)

- It is allowed to account for biomethane **in volume units** (cubic meters) and **additionally in energy units** (kWh) until May 1 following the day of termination or cancellation of martial law in UA (Section VI, clause 1.2)

› Customs Code of UA

Customs processing of biomethane is carried out on the basis of information on the volume of biomethane, which, when transported by pipeline, **may be replaced by a corresponding volume of natural gas or a mixture of natural gas and biomethane**, at each gas acceptance/transfer point separately

**Temporarily valid:*
- Before joining the biomethane register to the EU database; - Until the ban on export or the export quota for biomethane is lifted; - Before switching to accounting in energy units (precondition - cancellation of Martial Law in UA)

BIOMETHANE PRODUCERS' INTERACTION MODEL WITH UA SSO

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one-time

✓ Conclusion of a Standard Natural Gas Storage (injection/withdrawal) Agreement

one-time

✓ Formalizing I-Platform access

monthly

1 Submitting a nomination/renomination

2 Storage of volumes in m3 in UGSs for export in accordance with UA Law

MIN 1 GAS MONTH

3 Registration of the **Act on movement of natural gas** provided when exporting for opening of a **periodic customs declaration** in accordance with the order of the Ministry of Finance

4 Closing of the allocation according to the OGTSU's final data

FOR EXPORT

STORAGE AGREEMENT

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AGREEMENT

*if the mentioned documents are submitted in a foreign language, their certified translation into Ukrainian shall be also provided!

HOW TO BECOME A CUSTOMER

Download the draft of the agreement and a list of documents required for the agreement conclusion

Fill out and sign the agreement application form + the agreement (2 copies)

Send the scanned documents required for agreement conclusion to:
front-office@utg.ua

After confirming correctness of the provided package of documents, send the application and 2 copies of the agreement (paper) to:
9/1 Klovskyi Uzviz, 01021 Kyiv, Ukraine
noting "UGS - to the attention of the Front office team"

Please wait for a notification about the stage of execution/signing of the agreement by email or phone (phone number specified in the Agreement) (clause 12.4)

ACCESS TO THE UA SSO I-PLATFORM

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The Customer provides necessary documents to get access to the UA SSO I-PLATFORM

1

SUPERIOR

Notification for creation of the I-Platform Authorized User Account Application

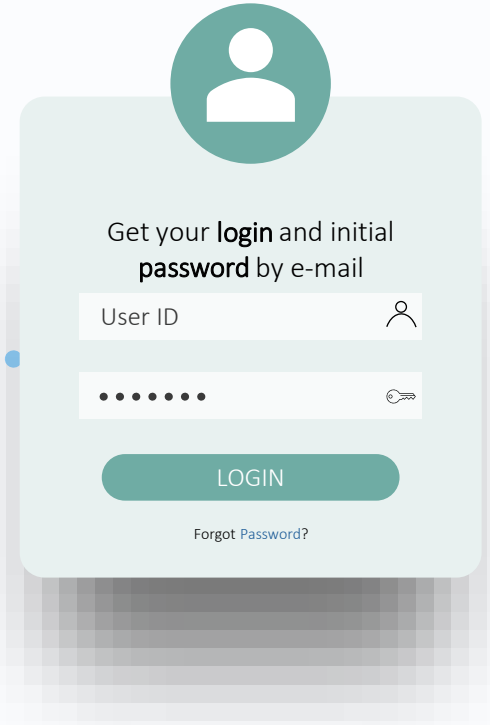
AUTHORIZED PERSON

Power of Attorney for each person authorized to access the I-Platform Annex 1

2

UA SSO TEAM

Login + password for the I-Platform access will be sent to the e-mail specified in the Application within 2 days



*The user shall perform the first log in into the I-Platform within **3 calendar days** and change the initial password (personal key)

Solely the personal key owner shall impose the EDS on the I-Platform!

CUSTOMER'S ACCOUNT ON I-PLATFORM

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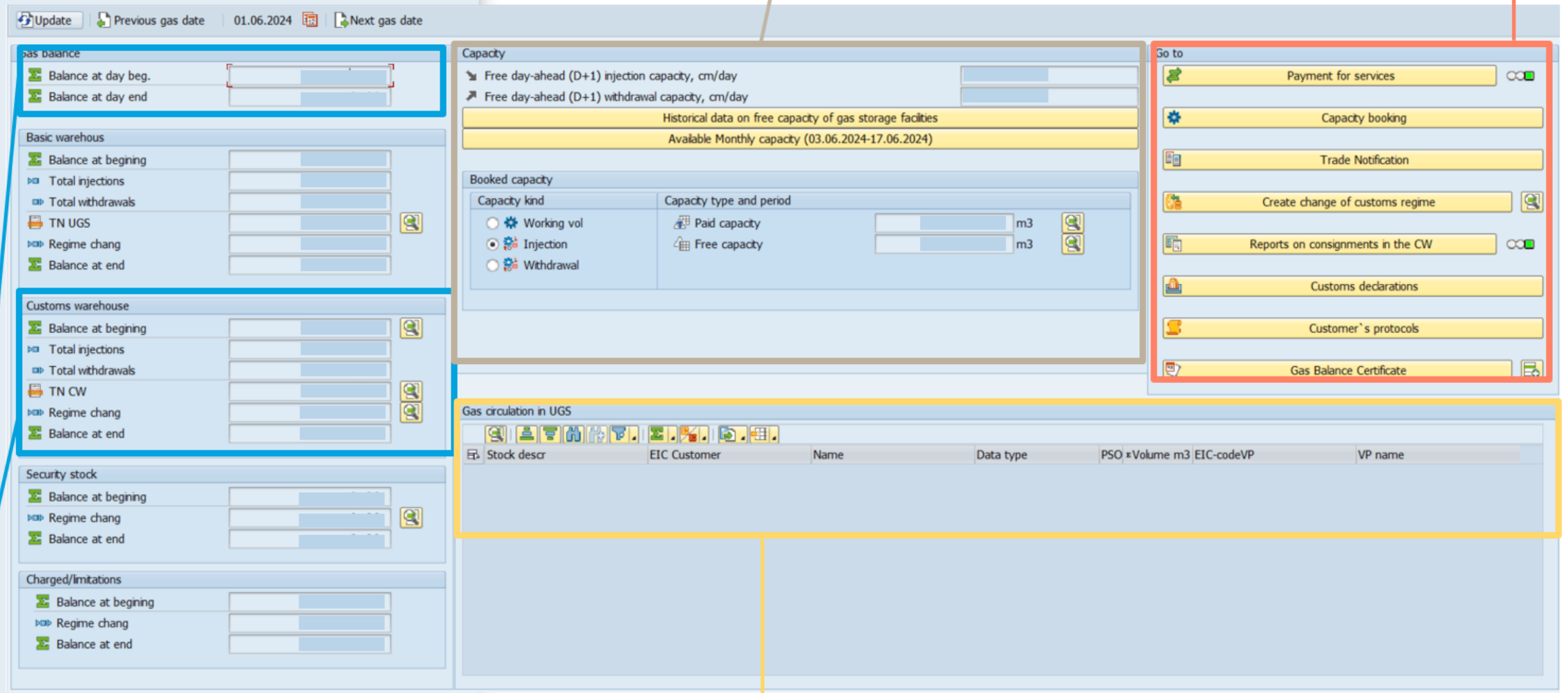
Capacity data

Quick access menu



Gas balance at the storage account
[for gas movement within a gas day]

Gas movement data

STORAGE CAPACITY BOOKING

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Firm - **60%**

Conditionally firm* - **30%**

Interruptible - **10%**

90% **from available capacity**

** submit nomination until 3 pm D-1 for gas day D*

Annual capacity:

» working volume
» bundled capacity

Capacity is booked from the last Monday of January - 2nd Monday of February
Available for booking for a period of 1-4 years

Season capacity:

» working volume
» injection
» withdrawal

Capacity booking for the injection season: last Monday of January - 2nd Monday of February
For the withdrawal season: last Monday of July - 2nd Monday of August

Monthly capacity:

» working volume
» injection
» withdrawal

Capacity is booked from 1st Monday - 3rd Monday of M for M+1 and until the end of the storage year

Daily capacity:

» working volume
» injection
» withdrawal

Day-ahead service = nomination/trade notification payment no later than the end of the banking day D-2 (prior to the day of service provision)

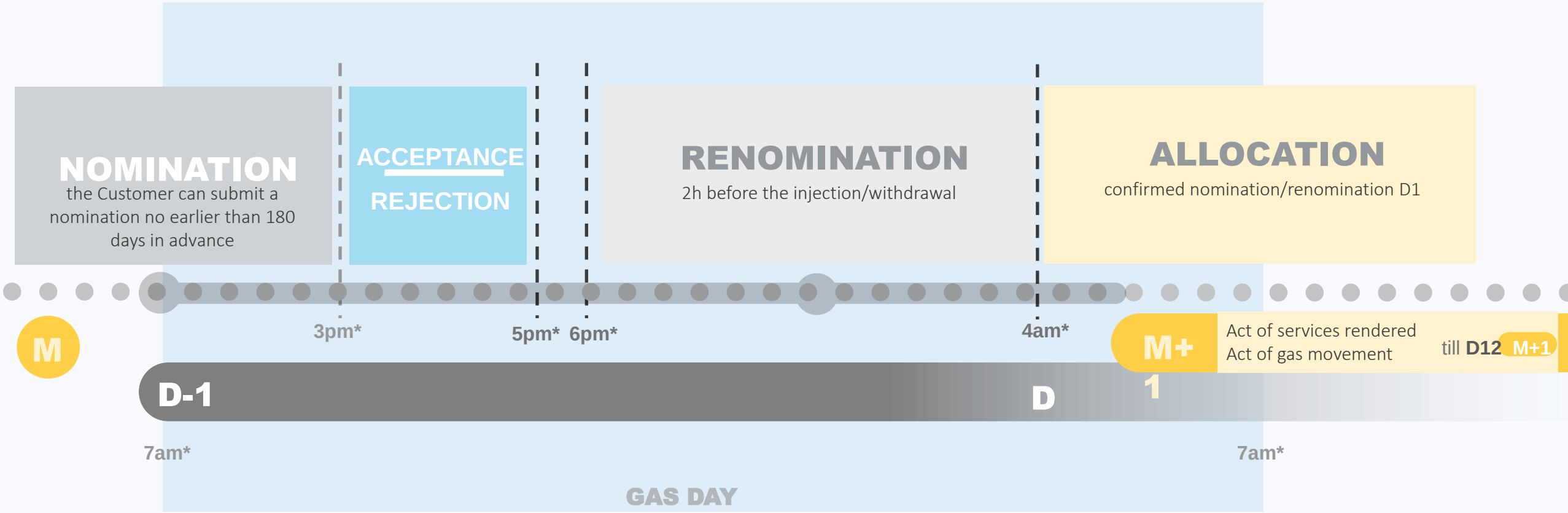
PAYMENT IS MADE 5 DAYS PRIOR TO THE SERVICE PROVISION

1 Fill out the appropriate service calculation form

2 Pay the invoice - regular payment procedure using payment form

NOMINATION /RENOMINATION /ALLOCATION

via the UA SSO I-Platform



In the same period upload 3 separate nominations/renominations for the same volume of gas:

- to the UA SSO Platform
- to the UA TSO Platform
- EU TSO Platform

** (EET) Eastern European Time*

DETAILS OF BIOMETHANE ACCOUNTING BY THE SSO

Execution of the Act on movement of natural gas

ACT No.
on movement in underground gas storages (UGS) of natural gas and/or biomethane accounted on the Customer's storage account

Kyiv

Joint Stock Company Ukrtransgaz (the Storage System Operator, the SSO) acting on the basis of License for storage of natural gas, gas (methane) of coal deposits, series AE No. 194512, dated 28.02.2013, issued by NERC, and being a holder of the customs warehouse (CW) (customs warehouse registration No. M/0487/V/01), represented by _____, acting on the basis of _____, and ***(name of the Customer), EIC,*** (**Customer**), represented by _____, acting on the basis of _____, according to the Gas Storage Code, have drawn up this Act stating that in accordance with the natural gas storage (injection/ withdrawal) agreement No. ____ dated _____ between the SSO and the Customer, there was the following flow of the **Customer's** natural gas **over (period)** in **the SSO's** UGS:

	natural gas volume, tcm	incl.		
		biomethane, kWh	security stock	gas in the CW regime
On the storage account at the beginning of the reporting month	0,00000	0	0,00000	0,00000
Gas injected into UGS for the reporting month as per the SSO's allocations in accordance with Section IX of the Gas Storage Code	0,00000	0	0,00000	0,00000
Gas withdrawn from UGS for the reporting month as per the SSO's allocations in accordance with Section IX of the Gas Storage Code	0,00000	0	0,00000	0,00000
Transferred in accordance with confirmed trade notifications on transfer of natural gas stored in UGS	0,00000	0	0,00000	0,00000
Accepted in accordance with confirmed trade notifications on transfer of natural gas stored in UGS	0,00000	0	0,00000	0,00000
On storage account at the end of the reporting month	0,00000	0	0,00000	0,00000

** The Customer (biomethane producer) shall be solely responsible for the accuracy of information on the biomethane volumes in the Customer's storage account*

This Act has been drawn up as of _____ in 2 (two) copies with equal legal force, 1 (one) copy for each of the parties.

On behalf of the **Customer**	On behalf of the **SSO**
_____	_____

Based on results of the reporting month, the **service customer** (biomethane producer) **shall provide the SSO with information on the volumes of biomethane** injected/withdrawn into/from the UGSs according to the customer's data

In accordance with the Gas Storage Code, the **SSO** shall not **record the movement of biomethane on the service customer's storage account**, shall not receive such data regarding received/transferred volumes of biomethane **from the TSO**, **and shall not transmit such data to the TSO**

The **customer** (biomethane producer) **shall be solely responsible for accuracy of information** on the volume of biomethane in the customer's storage account

ANNEX 1:

Storage Tariffs (Resolution of the NEURC No. 656 dated 30th June 2022)

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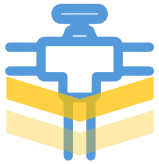
Formulas:

IINJECTION FEE

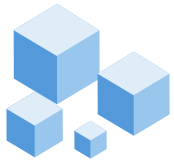
ƒ = 243.52 UAH* x 1.2(VAT) **x** COEFFICIENT **/** (FX**) **/** 10.595 (GCV)



0.72 €/MWh *injection*

STORAGE FEE
(WORKING GAS VOLUME)

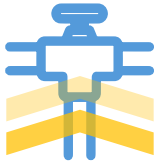
ƒ = (1 month) **=** N-days **x 0.4 UAH* x** 1.2(VAT) **x** COEFFICIENT **/** (FX**) **/** 10.595 (GCV)



0.03 €/MWh *storage fee for a month*

WITHDRAWAL FEE

ƒ = 253.03 UAH* x 1.2(VAT) **x** COEFFICIENT **/ (**FX**) **/** 10.595 (GCV)



0.75 €/MWh *withdrawal*

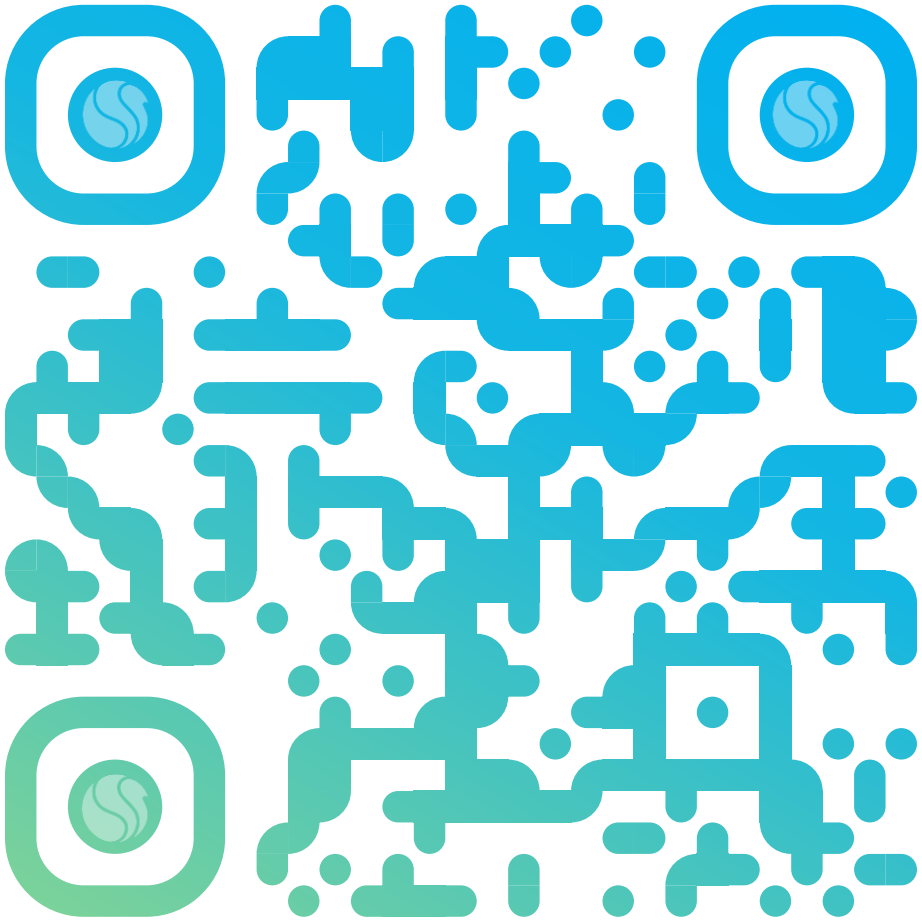
1.5 €/MWh

cca full gas storage tariff until 01.04.2025

	Annua	Coefficient:	
Injection			
Storage	1.0		1.1

** Tariff for 1 000 m^3/day*
*** FX — Foreign exchange. The indicator depends on the UAH/EUR exchange rate*

CONTACT US





Sustainability, verifiability and traceability

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Verification Scheme GmbH

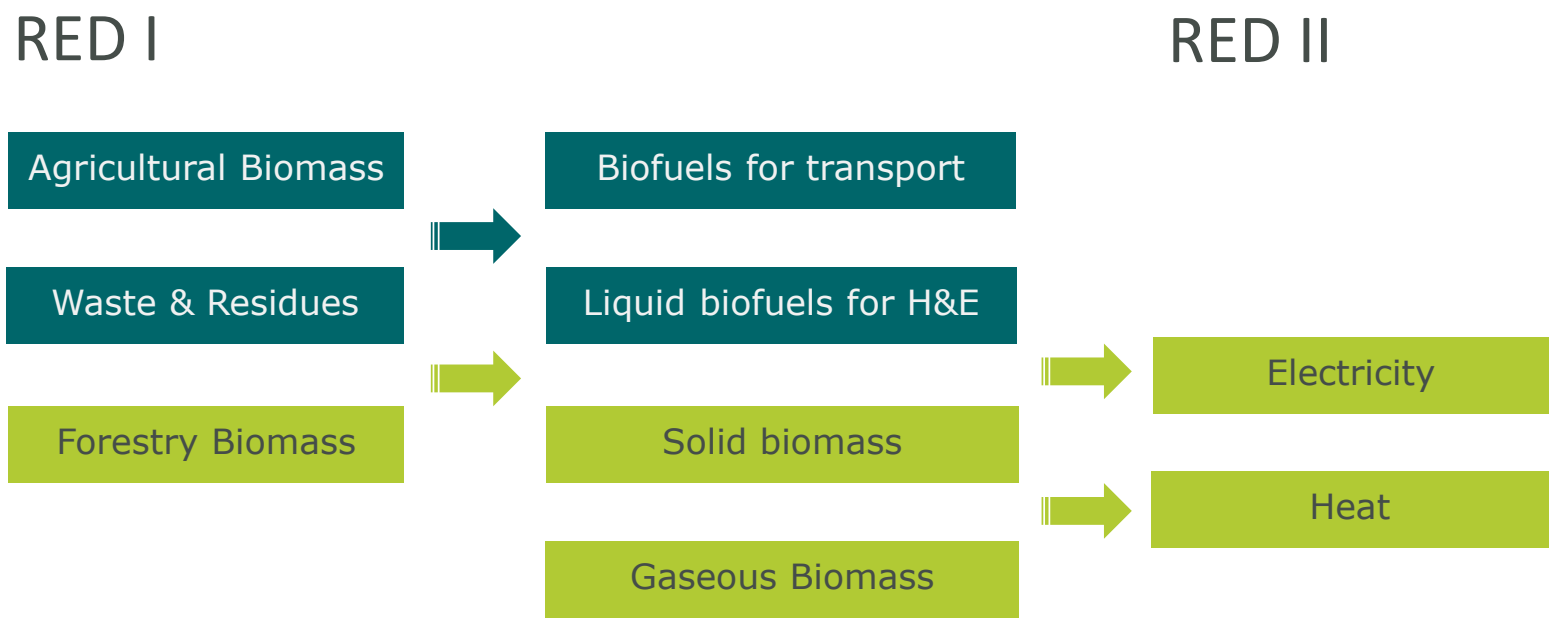
Thomas Siegmund
SUSTAINABLE RESOURCES
Verification Scheme GmbH



Renewable Energies Directive RED

- ✓ In 2009, the EU member states agree on binding sustainability and greenhouse gas reduction targets for the use of biofuels (for transport) and bioliquids (for H&E production) from 2010 on
- ✓ In 2018, with the RED II the requirements set out in the RED were extended to the heat and electricity generation from solid and gaseous biomass fuels and complemented with sustainability criteria for forest biomass, to be enforced until July 2021
- ✓ In 2023, the EU agreed on the RED III, strengthening the sustainability criteria for forest biomass production, putting GHG mitigation obligations to all economic operators in the scope of the RED III and introducing strong traceability requirements with the obligation to use the UDB

From RED I to RED II



RED II increases the complexity of the feedstock basis and utilisation paths

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EU legal framework on renewable energies and sustainable biomass

Goal: To move away from fossil fuels towards cleaner energy – and to deliver on the EU's Paris Agreement commitments for reducing greenhouse gas emissions.

European Commission

- ✓ EU Renewable Energy Directive 2018/2001 (RED II)
  → Renewable energy sources consumption of 32% by 2030.
- ✓ European Green Deal and European Climate Law
  → Achieving climate neutrality by 2050 and reducing GHG emissions at least 55% by 2030.
- ✓ Fit for 55 Package
  → Proposals to revise EU legislation and ensuring meeting the GHG emissions reduction of 55% by 2030.

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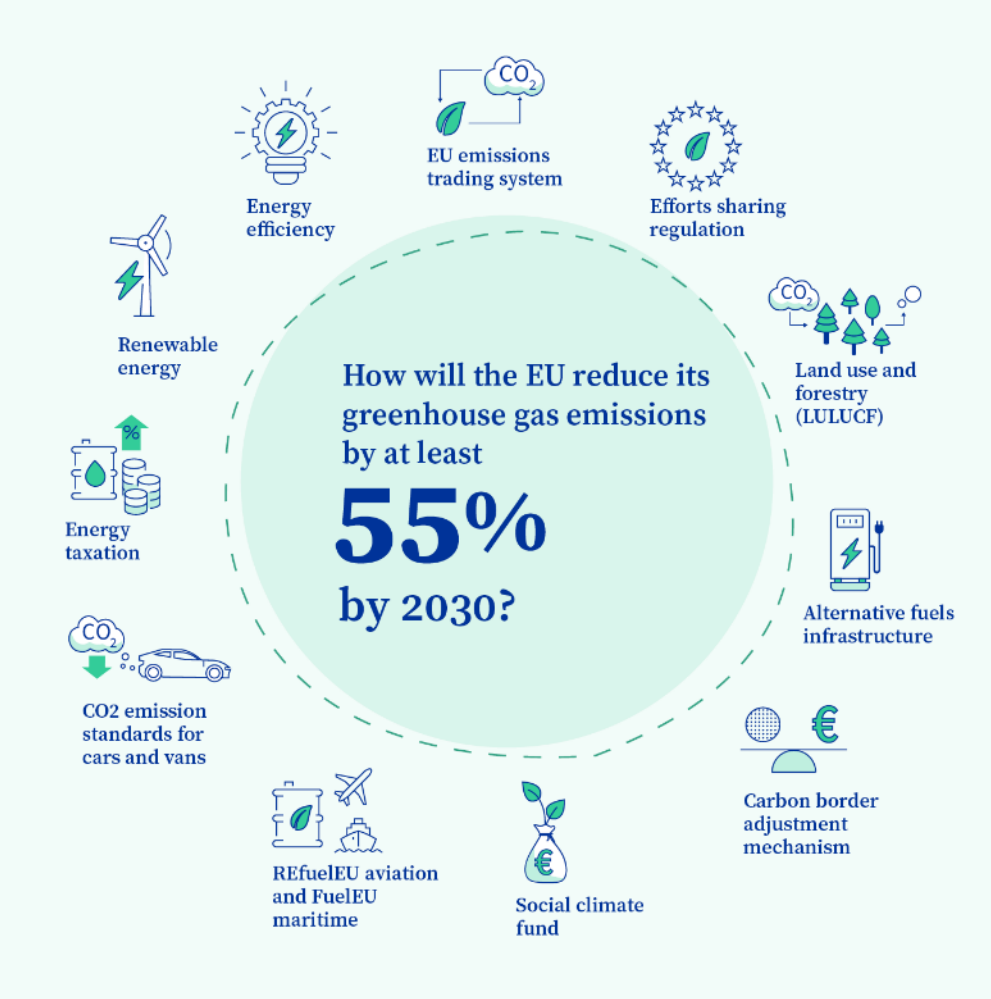
Fit for 55 package: Revising EU's climate, energy and transport legislation



Implications for Biomass operators

- **Continuous changes** to EU/national and regional legislation

  Revised Renewable Energy Directive (RED III):
  - Primary forest biomass not accounted for subsidies
  - Expanded scope: 7.5 MW (instead of 20 MW)
  - Increased biodiversity protection (E.g. old growth forests)
  - Cap to be defined by Member States on forest biomass
  - Increased GHG emissions savings to 85% (2026)

- **Increasing requirements and complexity** for operators in the biomass supply chain EU

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When do MS need to implement REDII?

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RED II Art. 29 (1)

>> Energy from (…) biomass fuels shall be taken into account for the purposes referred to in points (a), (b) and (c) of this subparagraph only if they fulfil the sustainability and the greenhouse gas emissions saving criteria (… laid down in paragraphs 2 to 7 and 10:

(a) contributing towards the Union target (…) and the RES shares of Member States;

(b) measuring compliance with renewable energy obligations (…);

(c) eligibility for financial support for the consumption of (…) biomass fuels.

Not SURE, but the legislator regulates who is required to provide proof!

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Who is obliged?

Article 29 (1): Biomass fuels shall fulfil the sustainability and GHG criteria if used in installations with a total rated thermal input of:

All producers of biofuels and gaseous transport fuels

20 MW (solid biomass for H&E)

2 MW (biogas for H&E)

RED III: + Producers of CH_4 with 200 Nm^3/h

This applies to all biomass and biogas plants producing electricity and heat/cooling from solid or gaseous biomass.

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Obliged stakeholders

RED II concerns companies that …



…operate a biogas plant and

which is within the scope of application



. . . produce or deliver biomass fuels (feedstock, biowaste, manure etc.) to obligated plants

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Key requirements

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- ✓ Sustainable production of biomass (fuels) and energy
- ✓ Minimum GHG-Mitigation
- ✓ Traceability and mass balancing
- ✓ Checks of plausibility (e.g. energy produced vs. biomass fuel used)
- ✓ Verification of Proofs of Sustainability (e.g. in NABISY, UDB)

RED III: GHG mitigation requirements

	Start of operation	Capacity	Years of operation	Mitigation	Due date
Solid biomass	< 31.12.2020	> 10 MW	15	80 %	01.01.2026 – 31.12.2029
	01.01.2021 – until RED III enters into force	> 10MW		70 %	With RED III enters into force
				80 %	01.01.2030
	After RED III enters into force	> 7,5 MW		80 %	With RED III enters into force
Biogas	< 31.12.2020	> 2 MW - < 10 MW	15	80 %	01.01.2026
		> 10 MW		80 %	01.01.2026 – 31.12.2029
	01.01.2021 – until RED III enters into force	> 2 MW - < 10 MW	< 15	70 %	With RED III enters into force
			> 15	80 %	With RED III enters into force
		> 10 MW		70 %	With RED III enters into force
				80 %	01.01.2030
	After RED III enters into force	> 2 MW		80 %	With RED III enters into force

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GHG mitigation

GHG mitigation can be calculated by

- ✓ using default values – only eligible if value chain is identical with assumptions
- ✓ using actual values / own calculations – required if default value is not available
- ✓ using a combination of (disaggregated) default values and actual emissions

Allocation rules and classification of feedstock essential for sound GHG-balances!

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How to use default values

- ✓ Source: Directive (EU) 2018/2001 (RED II), Annex VI, Part A ➡ production of E & H/C
- ✓ Unit: Percent [%]
- ✓ Reference: Fossil fuel comparator
- ✓ Prerequisite for use:
  - No land use change (e_l) ≤ 0
  - Process engineering & input materials meet specifications
- ✓ Indicated on delivery slip (economic operators up to the last interface)

  e.g. ““total default value used”

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Emissions of biomass fuels

GHG emissions of biomass fuel

$$E = e_{ec} + e_l + e_p + e_{td} + e_u - e_{sca} - e_{ccs} - e_{ccr}$$

E = Total GHG emissions from the use of the fuel

eec = emissions from the extraction or cultivation of raw materials

el = annualised emissions from carbon stock changes caused by land-use change

ep = emissions from processing

etd = emissions from transport and distribution

eu = emissions from the fuel in use

esca = emission savings from soil carbon accumulation via improved agricultural management

eccs = emission savings from CO2 capture and geological storage

eccr = emission savings from CO2 capture and replacement



+ GHG emissions of the production of E & H/C

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Calculating the details

Emissions from extraction and cultivation e_{ec}

$$E = e_{ec} + el + ep + etd + e_u - esca - eccs - eccr$$

$$e_{ec}' = \frac{EM_{Dünger}\left[\frac{kgCO_2eq}{ha*a}\right] + EM_{Pestizide}\left[\frac{kgCO_2eq}{ha*a}\right] + EM_{Brennstoff}\left[\frac{kgCO_2eq}{ha*a}\right] + EM_{Strom}\left[\frac{kgCO_2eq}{ha*a}\right] + EM_{N2O}\left[\frac{kgCO_2eq}{ha*a}\right]}{Ernteertrag_{Haupterzeugnis}\left[\frac{kg\,Ernteertrag}{ha*a}\right]}$$

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How to comply with RED II?

Article 30 (3), (4):

- ✓ Economic operators submit reliable information regarding the compliance with the sustainability and greenhouse gas emissions saving criteria
- ✓ These information have to be verified by independent auditing
- ✓ The Commission approves voluntary national or international schemes as means of verification of compliance with the sustainability criteria set out in RED II

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Two strong players joining forces

SUSTAINABLE RESOURCES Verification Scheme GmbH (SURE) was founded on March 27th, 2019 as a limited liability company and entered in the commercial register on May 24th, 2019. The two shareholders are:

Bioenergy Europe

- ✓ EU umbrella association with 41 associations and 140+ companies as members
- ✓ Provides market intelligence and knowledge
- ✓ Network of bioenergy stakeholders enabling stakeholder dialogue
- ✓ Consultation with policy makers and industry

Renewable Energy Directive certification

- ✓ Initiative of 12 associations in the biofuel sector
- ✓ More than 1.800 scheme users
- ✓ 25 certification bodies recognized
- ✓ Recognized by the European Commission

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Full scope certification

Forestry Biomass

Biomass plants

Electricity

Agricultural feedstock

Biogas plants

Waste & Residues

Heating & Cooling

Biofuels

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FACTS & FIGURES

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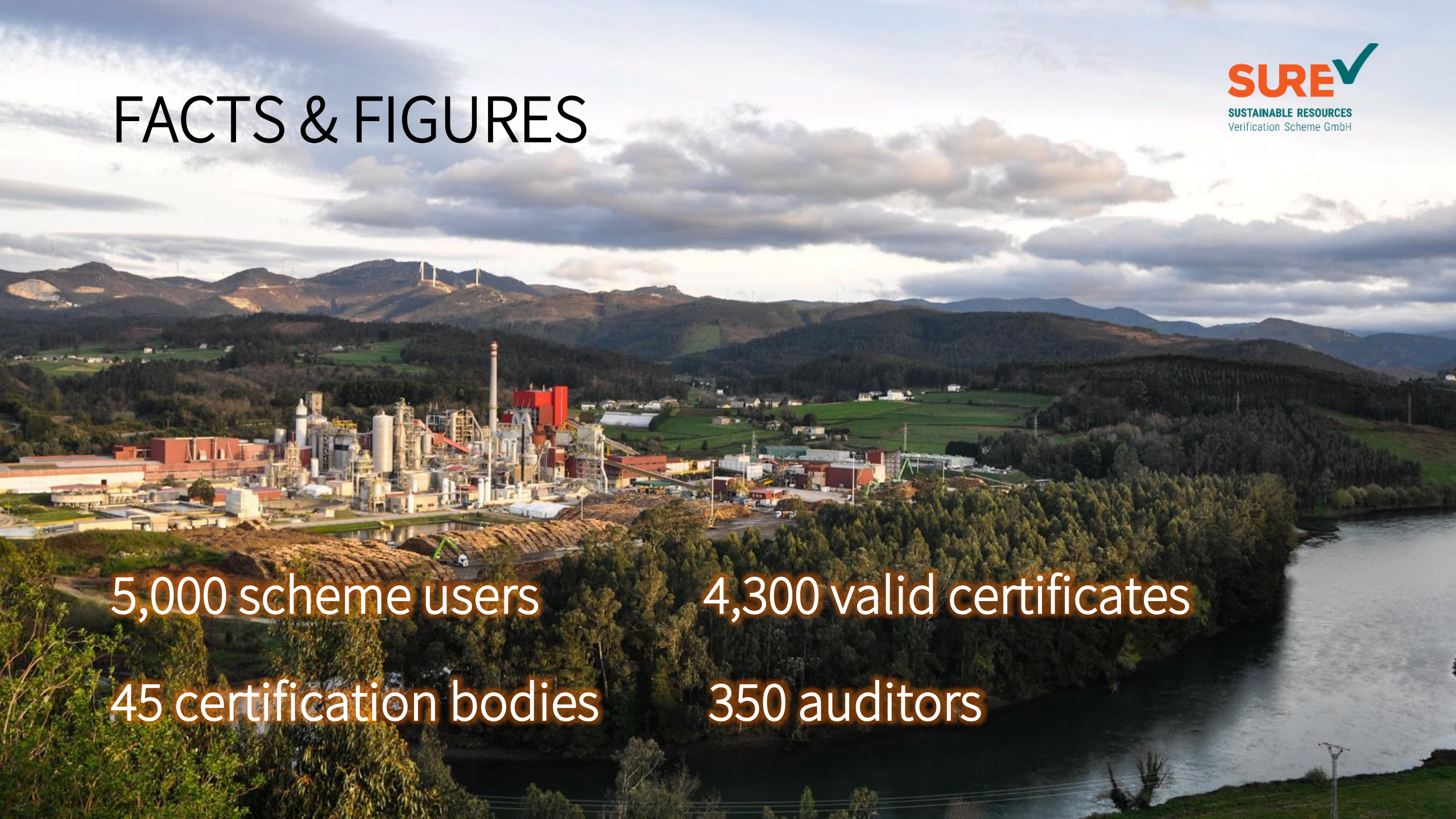

5,000 scheme users

4,300 valid certificates

45 certification bodies

350 auditors

Certified biogas/biomethane plants

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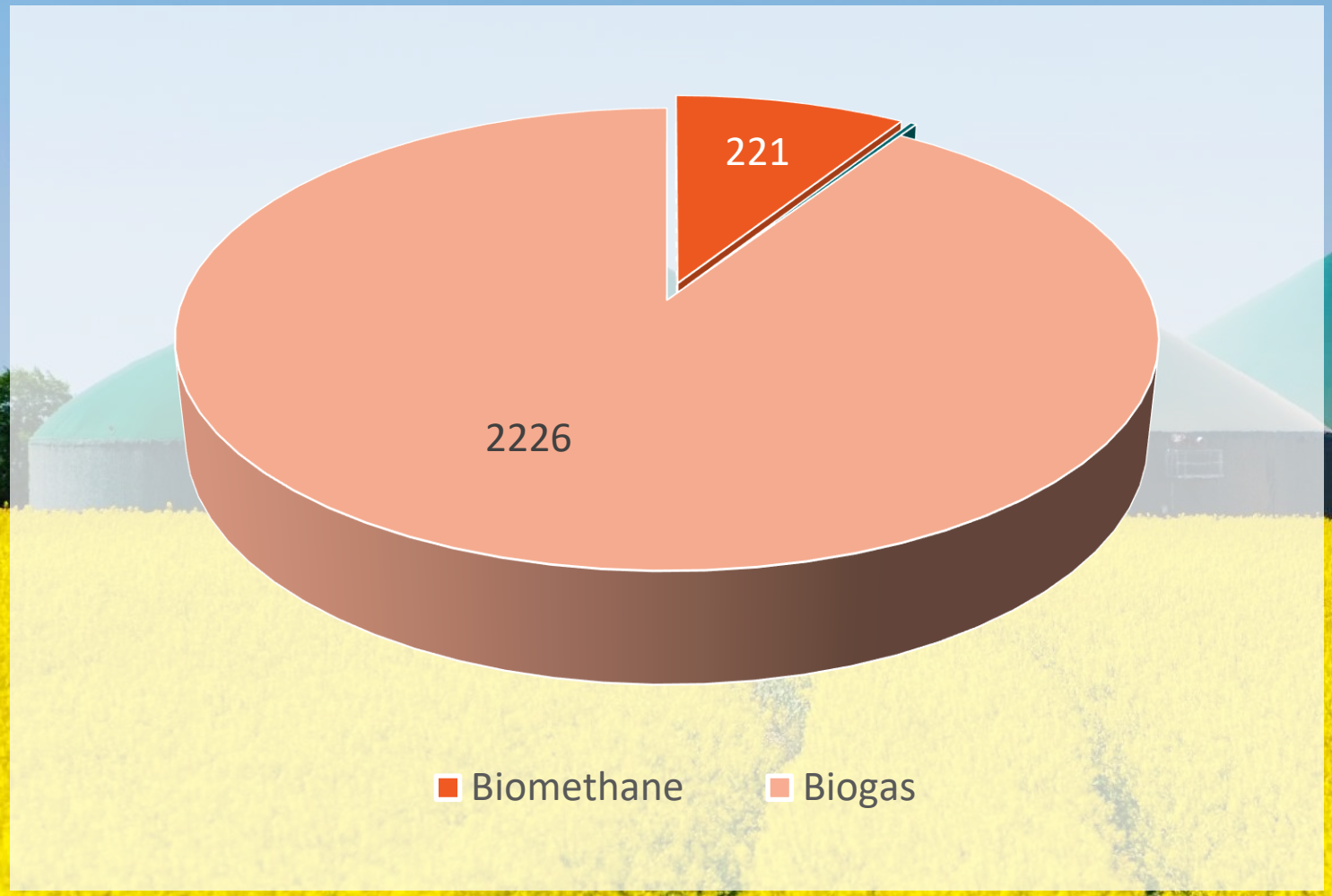
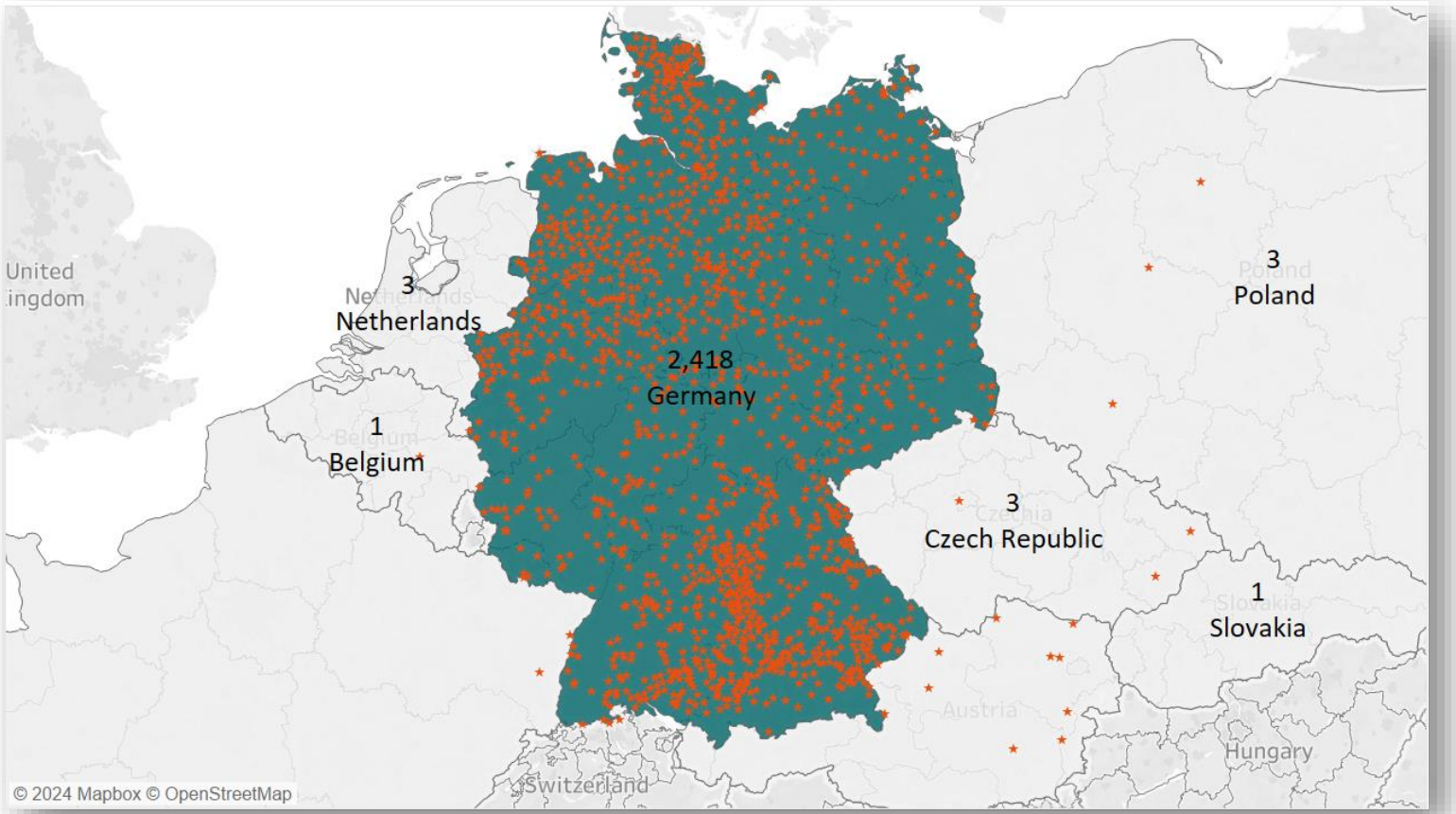


Certified Biogas / Biomethane plants



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Scheme principles


Scope and basic scheme requirements


Integrity Management


Neutral Inspection


Remote Audits


Definitions


GHG Calculation


Mass balance


Production of agricultural biomass


Production of forest biomass


Risk assessment


Production of waste and residues from biomass


Use, processing, trading and conversion

https://sure-system.org/en/documents.html

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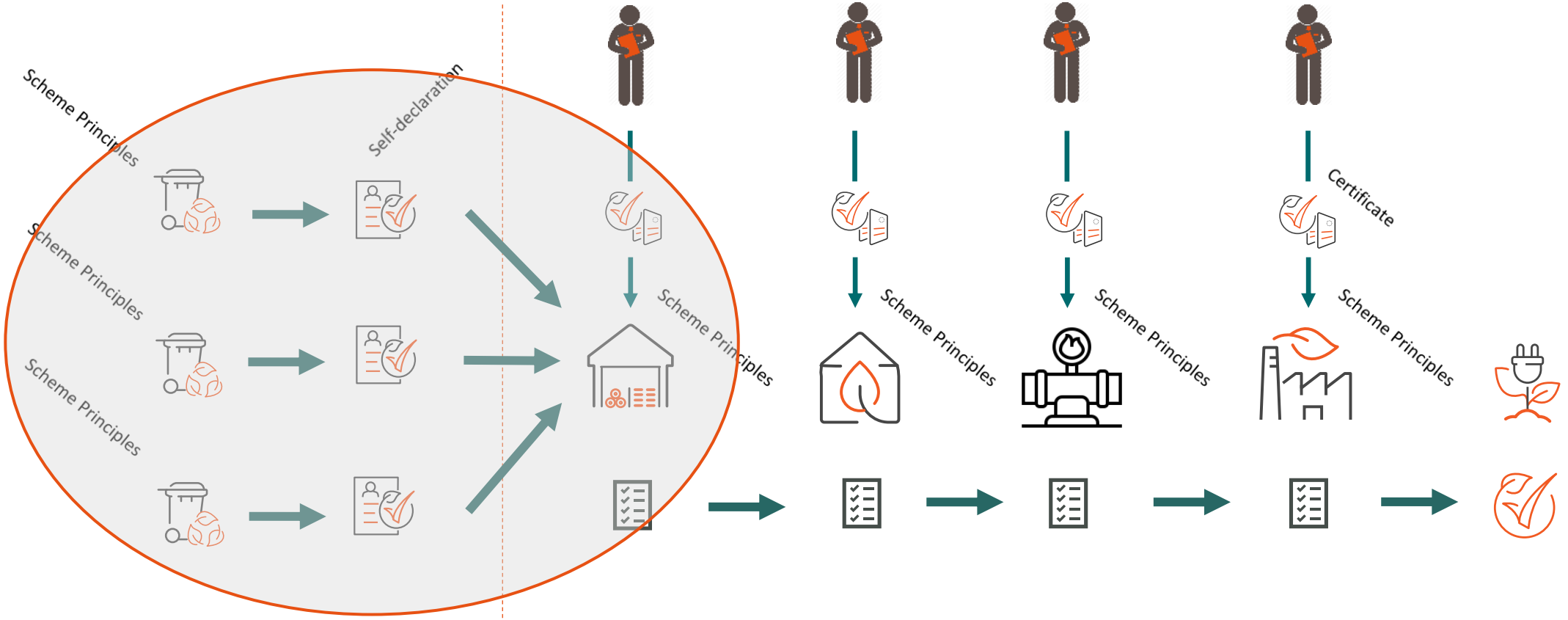
Chain of Custody-Certification



Biomass producers / Points of Origin

First Gathering Point / Collector

Biomass Fuel Producer

Trader

Biomass / Biogas plant

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Means of verification

Scheme principles for the production of …



Scheme principles for the use, processing and trading of biomass fuels and their conversion to electricity and heat



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Mass balancing

A mass balancing system is mandatory for all stages (except biomass/W&R production) up to the last interface:

- ✓ Biomass must be "identifiable"
- ✓ Permissible fixed balancing periods
- ✓ The "physical" flow of goods (inflow and outflow) is decisive for the balance sheet.

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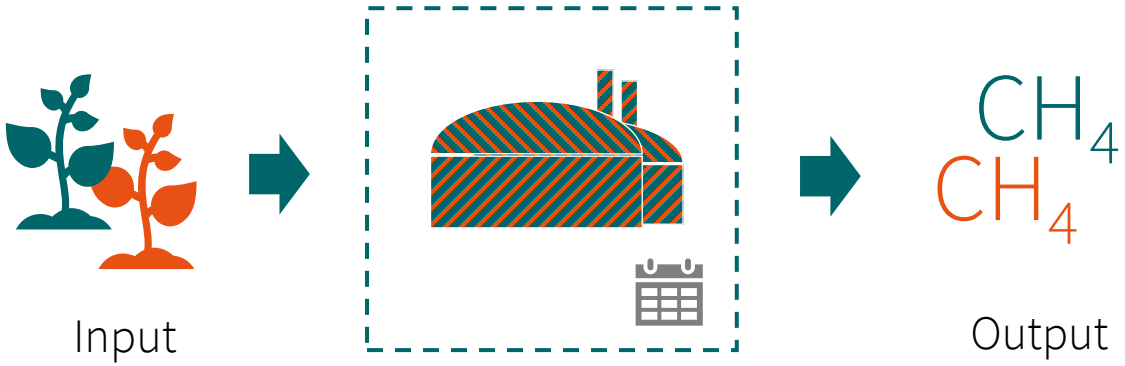
Principles of mass balancing



① Defined raw materials properties

② Spatial boundary of the site

③ Defined accounting periods

④ Accounting methodology (Proof of $\Sigma_{input} \geq \Sigma_{output}$)

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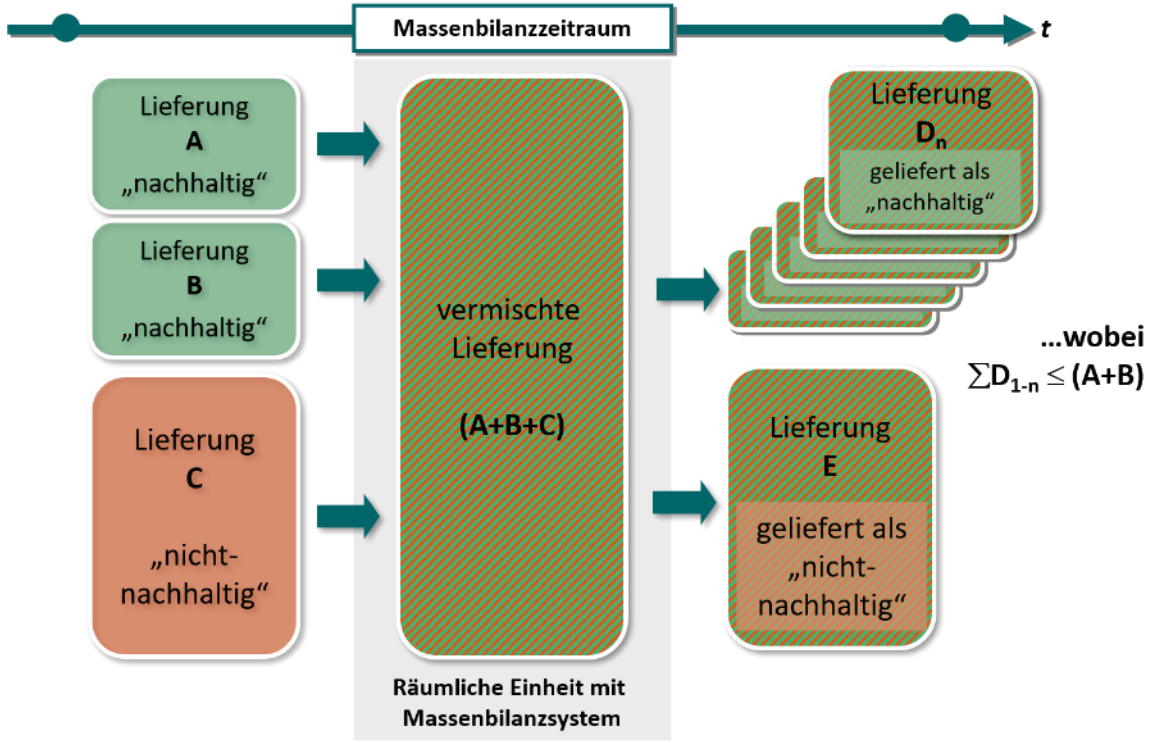
Principles of mass balancing

Mass balancing



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Proofs of Sustainability

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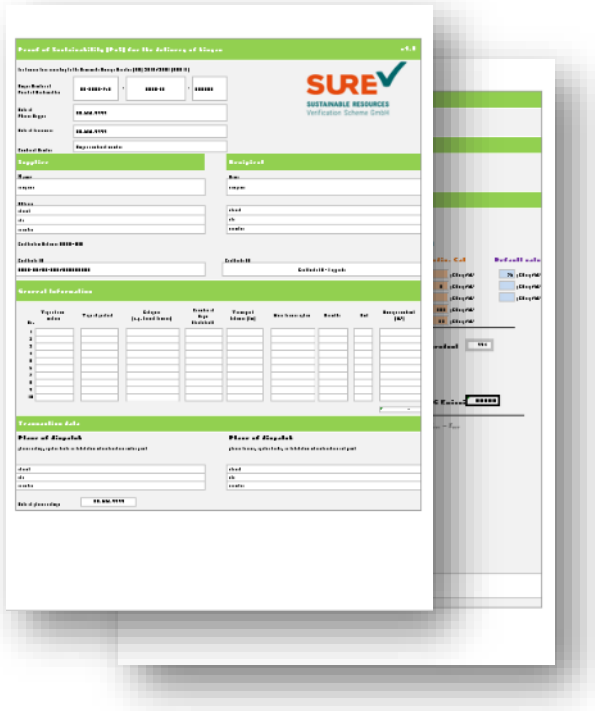
Supply chain

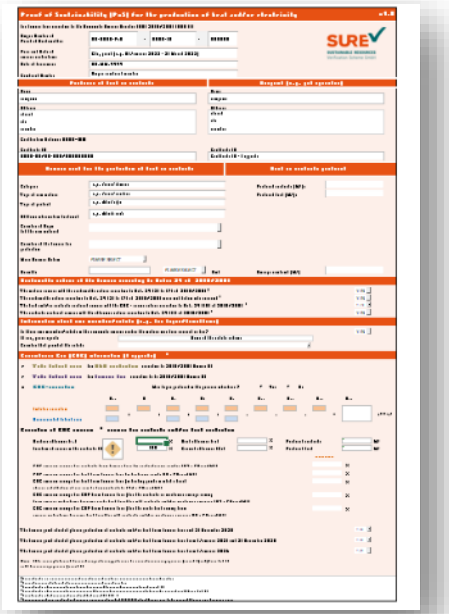


Solid biomass



Biogas

Final user



Producer of heat / electricity

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Union Database

RED III Art. 31a

1) By 21 November 2024, the Commission shall ensure that a Union database is set up to enable the tracing of liquid and gaseous renewable fuels and recycled carbon fuels (the 'Union database').

2) Member States shall require the relevant economic operators to enter in a timely manner accurate data into the Union database on the transactions made and the sustainability characteristics of the fuels subject to those transactions, including their life-cycle greenhouse gas emissions, starting from their point of production to the moment they are placed on the market in the Union.

   For the purpose of entering data into the Union database, the interconnected gas system shall be considered to be a single mass balance system. Data on the injection and withdrawal of renewable gaseous fuels shall be provided in the Union database.

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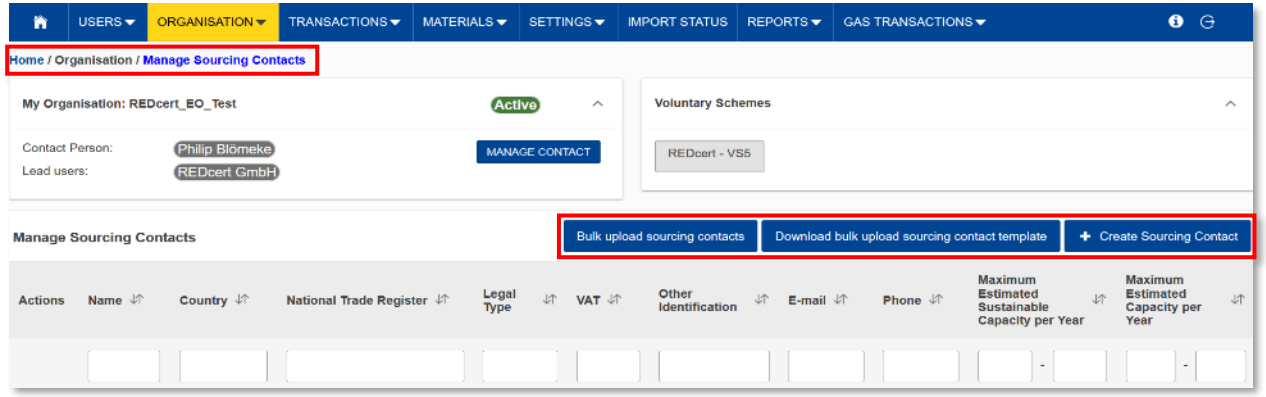
Union Database

RED III Art. 31a

5) Member States shall ensure in their national legal framework that the accuracy and completeness of the data entered by economic operators into the database is verified, for instance by using certification bodies in the framework of voluntary or national schemes recognised by the Commission (…)



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Draft Delegated Act

2) The empowerment of the Commission to extend the coverage of the Union database to cover data from the point of production or collection of the raw material used for the fuel production extends the coverage to (…) renewable fuels consumed in other end-use sectors beyond transport, which makes a vital contribution to the comprehensive monitoring of the production and consumption of the fuels, mitigating risks of double-counting or irregularities along the supply chains covered by the Union database.

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Draft Delegated Act

Article 3

1) Voluntary and national schemes shall register in the Union database all economic operators dealing with biomass raw materials collection, preparation or first transformation into intermediary products, who all are individually certified by the voluntary and national schemes for the purposes of ensuring compliance with the sustainability and greenhouse gas emissions saving criteria of Directive (EU) 2018/2001 and who shall enter transaction data in the Union database in accordance with Article 31a of Directive (EU) 2018/2001, in particular:
   a) all individually certified points of origin;
   b) first collection or first gathering points of waste or non-waste biomass; and
   c) traders of raw materials from biomass.

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Relevant links

- UDB Live Version:
  https://webgate.ec.europa.eu/UnionDatabase
- UDB Test version:
  https://webgate.acceptance.ec.europa.eu/udb
- Step-by-step guide to access :
  https://redcert.org/images/UDB/How_to_get_access_to_the_UDB.pdf
- NTR-ID (unique company identifier in the UDB): https://wikis.ec.europa.eu/pages/viewpage.action?pageId=90278474
- User Guides:
  https://wikis.ec.europa.eu/display/UDBBIS/User+Guides
- Data Protection Regulation of the UDB:
  https://webgate.acceptance.ec.europa.eu/udb/privacy-statement und
  https://commission.europa.eu/publications/security-standards-applying-all-european-commission-information-systems_en

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SUSTAINABILITY AND TRACEABILITY WITHIN THE FRAMEWORK OF THE NEW EXPORT LAW

Kateryna Postolenko
BVC Ukraine Sustainability Manager

HOW SUSTAINABILITY AND TRACEABILITY REQUIREMENTS ARE ADDRESSED. PART 1

Before national biomethane registry is integrated to UDB transactions could be done without unique number from the biomethane registry but with the relevant sustainability certificate for producer and PoS file for the amount

Export can be applied only to the amounts stored in the gas storage in the month preceding the export date.

As per Order #1250/42595 dd 15.08.2024 that provides changes to Law #3616-IX dd 20.03.2024 for the period of when cl.9(33) chapter XXI of the Customs code and cl.1(1), 1(3) chapter VI Law "On alternative types of fuel"

1) Amounts of biomethane are transmitted through customs border of Ukraine by the pipeline on the basis of:

- **periodic customs declaration**
- **sustainability certificate for biomethane (certificate issued by on of the sustainability certification schemes approved by EC as per the rules of the RED II and all schemes that all supply chain shall be certified/checked up to the point of feedstock origin)**
- **documents that confirm that biomethane producer is linked to gas transport or gas transmitting system with the usage of the automated flow meter (chromatographer), gas metering unit – act and scheme of the balance and operation responsibility of the parties, commercial commission operation act of the gas measuring unit with the use of flow chromatographer (or separate acts if the measuring unit and chromatographer are located separately);**
- **act of the acceptance-transfer of the produced biomethane – document that contains data of the produced biomethane in the energy units and volume units, signed by the biomethane producer and operator of the gas transport system or gas distribution system;**
- **act from operator of the gas storage of Ukraine for the movement of natural gas/biomethane in the gas storages that is accounted on the account of the customer;**

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HOW SUSTAINABILITY AND TRACEABILITY REQUIREMENTS ARE ADDRESSED. PART 2

2) Export of the amounts of biomethane transmitted through customs border of Ukraine by the pipeline is done on the basis of :

- **Additional declaration (declarations) with identification of the exact data for the biomethane volumes exported through Ukrainian customs border as per periodic declaration;**
- **Proof of Sustainability;**
- **Total act of the transfer-acceptance of the natural gas by the carrier – document, signed by operators of the gas transport system of Ukraine and boarding country, which contains the data of the natural gas volumes (biomethane that during carrying by the pipeline is substituted by its physical-chemical characteristics by relevant volumes of natural gas or mix of natural gas and biomethane) carried through Ukrainian customs boarder (in case of availability amounts of the balancing of natural gas and amounts of natural gas as per operations of backhaul) with identification of the number-letter codes of the recipients and suppliers identification (shipper pair);**
- **Reference from gas transport system operator of Ukraine for accounting of the commercial injection\withdrawal of natural gas and/or gas mix, biomethane of the customer (biomethane supplier).**

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RED II SUSTAINABILITY CRITERIA

The European Commission has recognized voluntary schemes under the Recast Renewable Energy Directive (EU) 2018/2001.

- 2BSvs
- Better Biomass
- Bonsucro EU
- ISCC EU (transport biofuels)
- KZR INiG (transport biofuels and biomass for H&E)
- REDcert (transport biofuels)
- Red Tractor
- RSB EU RED (transport biofuels and biomass for H&E)
- RTRS EU RED
- SQC
- TASCC
- UFAS
- SURE (biomass for H&E)

3TH August 2021

TO WHOM IT MAY CONCERN

We, the undersigned Voluntary Schemes would like to clarify the following:

Recognition under RED II:

- In a letter dated 10th July 2021, the European Commission has informed Member States that some voluntary schemes have successfully passed the preliminary assessment for the formal recognition under RED II (i.e. are technically compliant with RED II). The following schemes are considered at this stage as having closed the outstanding issues in their preliminary assessment reports: 2BSvs, Better Biomass, Bonsucro EU, ISCC EU, KZR INiG, REDcert, Red Tractor, RSB EU RED, RTRS EU RED, SQC, TASCC, UFAS, SURE.

Application of RED II:

- The European Commission has requested the Voluntary Schemes to apply the RED II rules as of 1st July 2021 (the transposition date of RED II) even if they are not officially recognised at that date. These technically compliant schemes ensure continuity of activities between RED I and RED II; this continuity applies to all certified material transactions demonstrating compliance with the sustainability and GHG emissions savings criteria of the RED II.

Mutual recognition between Voluntary Schemes

- The undersigned Voluntary Schemes confirm mutual recognition of Certificates and Sustainability Declarations or Proofs of Sustainability issued by the above mentioned Voluntary schemes which are technically compliant with the RED II.

Expected time frame:

- The undersigned Voluntary Schemes have urged the European Commission to officially recognise the Voluntary Schemes without any further delay. The European Commission confirmed that that the recognition of voluntary schemes under the RED II is expected to happen in short term.

We hope that this statement may answer some of the questions raised on the market.

Delfina Rogowska Office Manager **KZR INiG**	Andreas Feige Managing Director **ISCC System GmbH**	Peter Jürgens Managing Director **REDcert GmbH** and **SUSTAINABLE RESOURCES Verification Scheme (SURE) GmbH**
Elena Schmidt Executive Director **RSB**	Bruno Berken General Director **2BSvs**	

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SIMPLIFIED SUPPLY CHAIN STRUCTURE

AGRICULTURAL/FORESTRY FEEDSTOCKS AND AGRICULTURAL/FORESTRY CROP RESIDUES - CERTIFICATION STARTS WITH FIRST GATHERING POINT



Farms/ Plantation/Forests

Agricultural feedstocks /Crop residues
Forestry feedstocks / Forestry residues



First Gathering Points



Processing Unit



Trader/Storage

WASTE AND PROCESSING RESIDUES - CERTIFICATION STARTS WITH COLLECTING POINT



Points of Origin

Waste / Processing residue
Renewable non-bio feedstocks



Collecting Points



Processing Unit



Trader/Storage

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CERTIFICATION EXAMPLES – FIRST GATHERING POINT

AGRICULTURAL AND FOREST BIOMASS AND RESIDUES - CERTIFICATION STARTS WITH FIRST GATHERING POINT





Further elements of supply chain – processing and distribution

Farms/ Plantation/Forests

Agricultural feedstocks /Crop residues
Forestry feedstocks / Forestry residues

First Gathering Point / Central Office

- Audit once a year (in special cases more often)
- Only on-site audits
- Risk evaluation – 3 levels (Regular/Medium/High)
- Sampling approach for associated farms and warehoues

s = r x √n (r – risk level, n - numer of units)

ISCC/REDcert/SURE: result always rounded up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 as well as 23.4 gets rounded to 2 (some exception for ISCC)

KZR INiG: result rounded half up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 but 23.4 gets rounded to 23

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CERTIFICATION EXAMPLES – COLLECTING POINT

WASTE AND PROCESSING RESIDUES - CERTIFICATION STARTS WITH COLLECTING POINT





Further elements of supply chain – processing and distribution

Points of Origin
Waste / Processing residue
Renewable non-bio feedstocks

Collecting Point / Central Office

- Audit once a year (Additional Surveillance Audits required after first cettification)
- Only on-site audits
- Risk evaluation – 3 levels (Regular/Medium/High)
- Sampling approach for associated warehoues and points of origin for **wastes generating more than 5 t per month (**ISCC, REDcert, SURE) **or more than 1 ton per month** (KZR INiG)

  s = r x √n (r – risk level, n - numer of units)

  ISCC/REDcert/SURE: result always rounded up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 as well as 23.4 gets rounded to 2 (some exception for ISCC)

  KZR INiG: result rounded half up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 but 23.4 gets rounded to 23

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CERTIFICATION EXAMPLES – PROCESSING UNITS

FURTHER ELEMENTS – PROCESSING UNITS







For all elements of the supply chain after the first gathering point or collecting point the certification requirements are the same regardless of the kind of raw material that enters the supply chain.

- Audit once a year (in special cases more often)
- Only on-site audits
- Risk evaluation – 3 levels (Regular/Medium/High)
- Sampling approach for associated warehouses

  s = r x √n (r – risk level, n - numer of units)

  ISCC/REDcert/SURE: result always rounded up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 as well as 23.4 gets rounded to 2 (some exception for ISCC)

  KZR INiG: result rounded half up to the whole number - For example, by this rule the value 23.5 gets rounded to 24 but 23.4 gets rounded to 23

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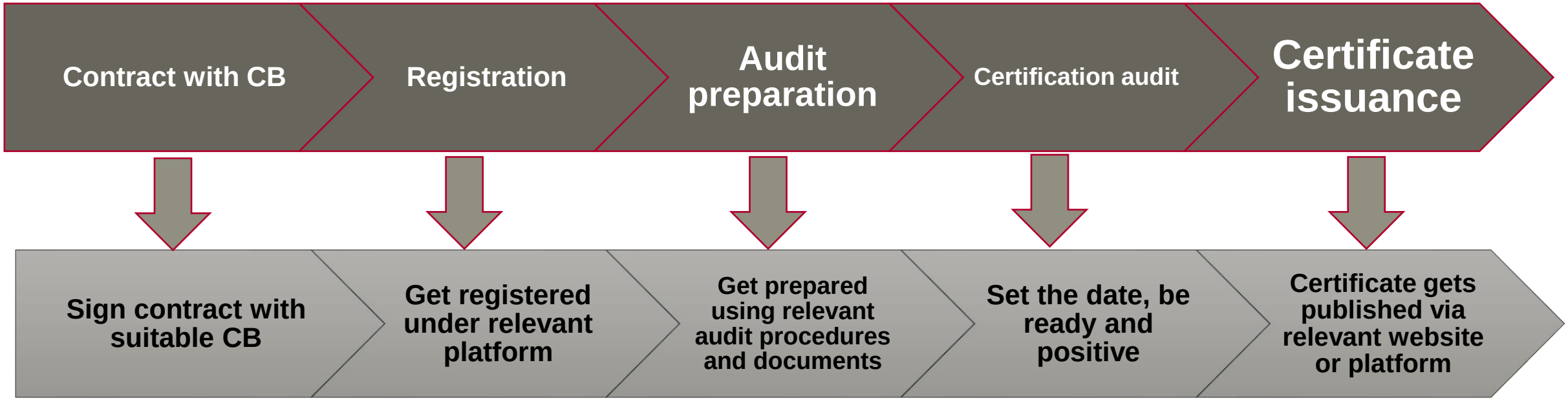
CERTIFICATION PROCESS OVERVIEW



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Presentation on Ukraine's Access to the Union Database and Biomethane Management

Objective: To provide an overview of the legal and practical mechanisms enabling Ukraine to access the Union database for biomethane export

Executive Summary

Institutional Framework
Ministry of Energy of Ukraine oversees policy implementation and coordination with biomethane producers, competent authorities, and state enterprises.

Step 1 - Done

Sustainable biomethane export opened
Laws Regulating Biomethane: Law on Alternative Types of Fuel, Law on the Natural Gas, Market Customs Code of Ukraine (amendments in 2024)

Step 2 - Done

Practical Implementation - Mass Balance, Verification, Traceability
1. Certification of biomethane producers according to ISCC standards, recognised by the EU.
2.Continuous monitoring and verification of quantity and quality of biomethane injected into the gas network.

Step 3 - Done

Monitoring and Quality Assurance
1.Continuous data transmission of gas composition and energy content to DSO/TSO.
2.Biomethane quality checks for sulfur, hydrogen sulfide, and other impurities. Equipment.
3.Gas chromatographs and meters for real-time monitoring.

Step 4- Done

Preventing Double Counting
1.*RED II Compliance:* EU member states submit data to Eurostat via SHARES tool.
2.*Ukraine's Approach:* The SHARES submission was paused during the war and will resume after. However, Ukraine does not count biomethane towards fulfilling its obligations, which can be confirmed.

Step 5- Done

Data Entry Into UDB
1.*Timeframe:* Data must be entered into the Union database within 3 working days.
***2.Information Included:* Details on gas network, metering points, producer/consumer data, volume of biomethane injected, and geographical coordinates.**

Step 6 - In progress

Ukraine's access to the UDB by November 2024
As part of the implementation of the Ukraine-EU Memorandum, a roadmap has been approved. A key step is Ukraine's access to the UDB this year.

Step 7 - In progress

Institutional and Legal Framework (Step 1 & Step 2)

The Ministry of Energy of Ukraine, as the central executive authority responsible for forming and implementing state energy policy, ensures the implementation of the roadmap for access to the Union database. The Ministry coordinates communication with biomethane producers, Ukrainian competent authorities, state enterprises, and other interested parties.

Ukraine has developed a transparent state policy in biomethane management, which is regulated by laws and subordinate legal acts, including: the Law of Ukraine "On Alternative Types of Fuel" , the Law of Ukraine "On the Natural Gas Market," the Customs Code of Ukraine, considering the amendments made by Law No. 3613-IX of 20.03.2024 "On Amendments to the Customs Code of Ukraine and Other Laws of Ukraine Regarding Special Features of Customs Control and Clearance of Certain Categories of Goods,» the Gas Distribution System Code, approved by the National Energy and Utilities Regulatory Commission, and the Gas Transmission System Code, approved by the same Commission.

Ukraine has already introduced several measures **to meet the requirements for mass balance, verification, and traceability of biomethane.**

’The Law No. 3613-IX of 20.03.2024 "On Amendments to the Customs Code of Ukraine and Other Laws Regarding Special Features of Customs Control and Clearance of Certain Categories of Goods" (hereinafter referred to as the Law) stipulates that **only biomethane producers certified under a voluntary scheme recognised by the European Commission (including ISCC) will be able to export biomethane to the EU.**

The certification procedures applied in Ukraine by ISCC and authorised certification bodies are identical to those applied in EU member states and **fully comply with RED II requirements.** Such certification includes verification of the sustainability of the entire biomethane supply chain, from feedstock origin to biogas and biomethane production, up to its injection into the grid.

Mass balance, Verification and Traceability (Step 3)

The role and scope of certification by voluntary schemes in RED

RED requires that all economic operators in the biomethane supply chain be certified by one of the voluntary schemes recognized by the EC. Transportation of materials is not included in the scope of certification – economic operators themselves are responsible for compliance with traceability of sustainable materials and corresponding final products (fuels) throughout the supply chain. Since biomethane is injected into and withdrawn from the European natural gas pipeline system, all elements of this system are considered transport and are therefore also not subject to certification by the voluntary schemes. GTS operators (DSO and TSO) are verifiers of biomethane volumes in their networks.

The role of the Union database in RED

RED introduces the mandatory Union database for tracking the movement of sustainable materials and fuels throughout the supply chain until their consumption. For biomethane, RED introduces the principle of a single mass balance system for interconnected infrastructure. The existing European natural gas pipeline network is an example of interconnected infrastructure. Therefore, the Union database is in fact a single mass balance system for the European interconnected natural gas pipeline network, and all volumes of biomethane entering and exiting the network must be reflected in the Union database in accordance with the requirements of RED. *Biomethane, which is not reflected in the Union database from the moment of its launch, cannot be considered as meeting the sustainability criteria RED.* TSO/DSO as verifiers of biomethane volumes must be registered in the Union database and submit data on biomethane injected into their network, as well as information on biomethane producers and their metering points.

The role of the Union database for Ukrainian biomethane

The Ukrainian gas transportation system (GTSU) is a part of the European interconnected natural gas pipeline network, as it has cross-border interconnection points with a number of EU member countries. Therefore, by definition of RED, the GTSU is also considered a part of the interconnected infrastructure, and therefore a part of a single mass balance system. *Therefore, all operations with biomethane in GTSU must also be registered in the Union database.*

Monitoring and Quality Assurance (Step 4)

Biomethane can be injected into both the transmission system (TSO) and the distribution system (DSO) in the integrated gas network of Ukraine. At each biomethane producer's injection point, the Law requires the **installation of a gas chromatograph and gas meter**, which ensure quality and quantity control of the injected biomethane. Without these, biomethane export by producers is impossible.

Monitoring and verification of the quantity will be conducted on a continuous basis, either every 10 minutes or 1 hour, depending on the requirements of the DSO/TSO operator, using a certified meter.

Data regarding the quality (gas composition and its energy content) will be transmitted daily from the chromatograph to the DSO/TSO operator.

In addition to the above verifications the DSO Operator **periodically collects pipeline samples to verify that the biomethane complies with the quality standards defined in the Gas Code**. This includes but not limited to checks for sulfur, hydrogen sulfide, and mechanical impurities.

Preventing Double Counting (Step 5)

	Potential ways for double counting	Ways / instruments of eliminating double counting
1	Double counting through sales of the same biomethane twice: one via Proof of Sustainability (PoS) and the other via Guarantees of Origin (GO).	Ukraine does not have a biomethane registry and does not issue GOs, making this type of double counting impossible.
2	The same economic operator selling the same batch of biomethane to multiple buyers.	Certification, surveillance, and recertification audits of economic operators in compliance with voluntary scheme requirements, conducted by independent auditors, along with the UDB tracking system for certificate
3	Double counting of CO_2 reductions in relation to the Paris Agreement and National Contribution Plans.	Ukraine's national statistics fully comply with UNFCCC requirements. In particular, biomethane injected into the gas transmission system (TSO) or distribution system (DSO) is not counted as consumed, and biomethane sold for export is not counted as internal consumption. All emissions in relations to NCPs are counted using energy consumption principle and not energy production principle.
4	Double counting of biomethane produced and exported in the SHARES instrument towards Ukraine's obligations.	Ukraine (via National Statistics of Ukraine) estimates and reports all figures in SHARES based on Eurostat methodology, which eliminates any potential for double counting. The whole purpose of SHARES tool is to avoid any double counting.

Data Entry Into UDB (Step 6)

The TSO Operator will provide **monthly updates** to the Union database in English by the 10th of each month, including details on biomethane producers' or consumers' operations, such as the biomethane producer or consumer identifier, biomethane code, injection or withdrawal period (start and end date), producer or consumer name, postal code of the commercial metering point, volume of injected biomethane in m^3 and MWh, gas transmission system identifier, country of injection or withdrawal, and commercial metering point number.

The legal mechanism will also require the TSO Operator to enter data into the Union database after receiving an electronic request from the Union database. This data will include: The name of the gas network to which the biomethane producer or consumer is connected, Commercial metering points of biomethane producers or consumers, including the name of the points, address of the points (which may match the production complex address), location of the points (city/village), region of the points (district, oblast), and geographic coordinates of the points (latitude and longitude).

The Gas Distribution System Operator provides the Gas Transmission System Operator with data to ensure timely data submission to the Union database.

The **monitoring and verification system is available for audit** and oversight by the national competent authority - specifically, the National Energy and Utilities Regulatory Commission, a permanent central executive body with special status, established by the Cabinet of Ministers of Ukraine.

After biomethane is injected into the grid, biomethane producers receive monthly reports from the TSO/DSO with official confirmation of the injected biomethane volumes for the respective gas month. **It should be noted that the state verification and monitoring system for biomethane will operate under martial law in Ukraine. Data will be collected and duly verified.**

Ukraine’s access to the UDB by November 2024 (Step 7)

As part of the implementation of the Ukraine-EU Memorandum, a **Roadmap has been approved**. A key step is opening the Union Database (UDB) for tracking liquid and gaseous renewable fuels and recycled fuels for the registration of transactions involving gaseous renewable fuels **by November 2024.**

Ukraine is committed to maintaining transparency, compliance with EU regulations, and ongoing coordination with European partners.

Ukraine has adopted the **necessary legal framework for monitoring biomethane injection into the grid and its export.** These acts mandate the verification of ISCC certificates, Proof of Sustainability for biomethane, and transfer-acceptance acts for biomethane injected into the grid, as approved by TSO/DSO. This framework fully controls the origin and volumes of biomethane and separates its accounting from natural gas within the system.

At this stage, **Ukraine deems it appropriate to designate the Gas Transmission System Operator (TSO) as the authority responsible for confirming biomethane volumes and communicating with the Union Database (UDB).** They will provide information on: Biomethane market producers (legal entity details, production facility addresses); Volumes of biomethane injected into and withdrawn from the grid (if needed) by each producer (in cubic meters and MWh); Exported/imported biomethane volumes; Any other information requested by the UDB.

It is crucial to receive a signal from the European Commission regarding the suitability of the mechanism outlined in point 4 concerning the TSO. Should this be acceptable, Ukraine is prepared to proceed and: 5.1. Amend the Gas Transmission System Code and the Gas Distribution System Code by November 21, 2024; 5.2. Register the TSO, in accordance with the functions outlined in point 2, with the UDB by November 21, 2024.



Seen from the EU

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An opportunity for growth and decarbonisation

The biomethane market: a matter of integrity

FOR UKRAINE

Attract foreign capital in the short term by giving producers a chance to deliver volumes in high market premium paying countries and lay the basis for further production which may serve future domestic demand

FOR THE EU

Tap into the Ukraine potential to access additional volumes of high valuable biomethane and move faster towards a fully decarbonised future while adding to the expansion and consolidation of the Single Market for Energy

RED

Sustainability certification

The value of biomethane depends on its ability to contribute effectively and sustainably to renewable energy targets and decarbonization.

EU certification system ensures that the sustainability and GHG emission performance of biomethane is reliably verified/ audited and correctly accounted.

Certificates of the EU recognized voluntary schemes/ the Proves of Sustainability (PoS) –condition No 1 - accounted towards consumption targets, supplier obligations and to allowed to receive financial support.

Mass-balancing validation and verification system

Mass-balancing certification system ensures verification and tracing of sustainability attributes of biomethane along the supply chain from production to consumption gate.

For biomethane transported through the natural gas grid it also ensures that no more certified biomethane exits the grid than what it has entered it within a single mass-balancing period.

Robustness and absence of double counting

Regulatory market demand and public support for biomethane require mechanisms to avoiding double counting of biomethane and/or its sustainability attributes both by economic operators and consumers, as well as by producing and consuming countries.

Going forward, reliability of verification and double-counting prevention at the level of the whole grid will be improved via the Union Database – by integrating the information submitted by Economic Operators and cooperation with grid operators.

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Benchmarking

Is Ukraine fit to export?

Sustainability certification

The biomethane export legislation requires all economic operators intending to export biomethane from Ukraine to be certified by EU recognized voluntary schemes



Mass-balancing validation and verification

The Ukrainian gas system as a whole is defined as a single mass balancing facility separate from the EU. EOs must obtain volumes confirmation from grid operators. No link to the UDB is available, yet mass balance can be verified according to RED general principles. Before exporting EOs must store the biomethane which goes beyond RED and adds unnecessary costs



Absence of double counting

Currently no other form of certification other than PoS exist in Ukraine and no demand for biomethane is in place domestically therefore the risk of double counting is minimal.

An agreement on statistical accounting is nonetheless not in place



While some formal aspects are missing the core of the integrity paradigm is respected

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