

## Outlook on handling of GO in Germany







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### **Legal Background**



#### Relevant primary legislation:

- Disclosure: Energy Law (Energiewirtschaftsgesetz EnWG)
- RES GO: Renewables Law (Erneuerbare-Energien-Gesetz EEG)

### "Old" legislation:

- Disclosure: no specifications of eligible tracking instruments at all
  → usage of GO (incl. EECS GO) on a voluntary basis
- RES GO: some 70 persons and organisations qualified as "Environmental Auditors" may issue RES GO
  - → for issuing of EECS GO, such auditors cooperate as Production Registrar/Auditor with Öko-Institut

### "New" legislation:

- Disclosure: mandatory use of GO cancelled in the new GO registry at the Federal Environment Agency (Umweltbundesamt – UBA) for explicit disclosure of RES-E
- UBA as competent body for RES-GO in Germany

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### Transition from old to new



- According to legal transition regulations, the new rules only apply after start of the UBA GO registry (which is planned for 1 January 2013)
- UBA has published more detailed notifications on how transition shall work in practice; key elements are:
  - For 2012 RES-E production, the "old" tracking procedures and systems (e.g. EECS, TÜV Süd, contract based tracking, …) still can be used without any restriction
    - Publication of 2012 disclosure data due 1 November 2013.
    - All RES-GO outside UBA registry shall expire by 31 December 2013 the latest
  - UBA also will allow for import of RES GO as soon as connected to the Hub (not before 1 April 2013)
  - Transfer between EECS registry and UBA shall only be possible for non-German GO (recognition of foreign GO...)
  - For 2013 RES-E production, only UBA registry may be used

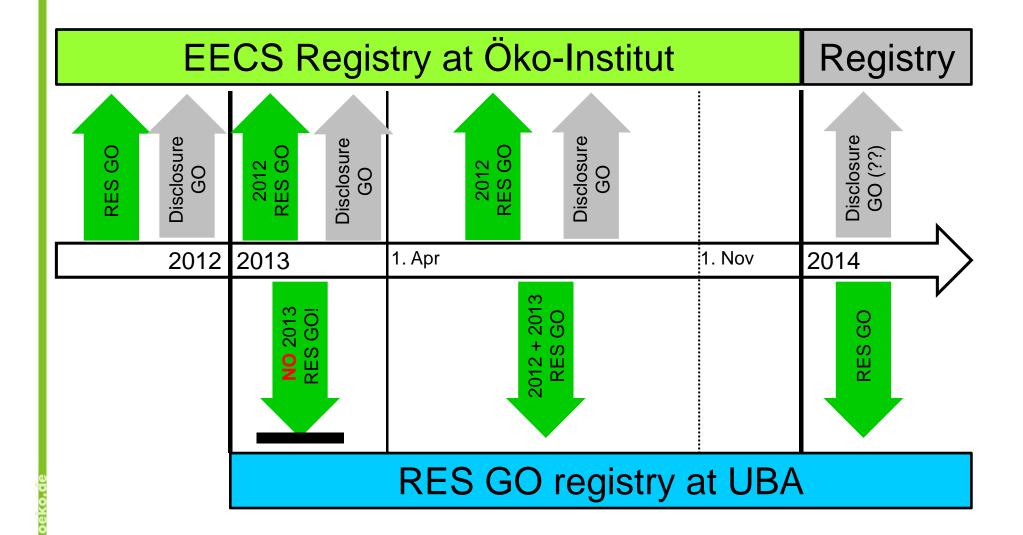
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### Role of Öko-Institut as of 2013



- Background assumption: start of operation of UBA registry by beginning of 2013
- EECS registry at Öko will remain operational for handling of 2012
  RES-GO and for EECS Disclosure GO until end of 2013
  - Necessary in order to allow for a "smooth" market shift from the old to the new registry
  - Öko-Institut / Grexel will technically block import of RES-E GO for 2013 production
  - As soon as UBA registry gets connected to the hub, this means that anyone exporting GO to Germany would have to distinguish between the target registries Germany/Öko and Germany/UBA
- German EECS users are already informed about these changes
- Öko will provide a revised DP also describing these changed regulations to the March GM (by then all regulations and dates should be confirmed)
- Provision of option for Disclosure GO after 2013 still unclear









## Thank you for your attention!







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