

Charge of VAT on GO trades

The following table is the result of a short survey of AIB members and observers, regarding whether or not VAT is charged on GO trades – in general this seems to be the case, although it is by no means clear in all countries, and the legal basis for making such charges is sometimes unclear.

The next issue of the AIB Newsletter will contain another survey of members and observers, this time identifying the competent bodies responsible for issuing guarantees of origin (GOs) for

renewable energy (RES), and for high-efficiency cogeneration (HEC), as the two are not always the same. It will also highlight whether separate electronic documents are issued for each type of GO (RES and HEC), or whether a single electronic document conveys both types of GO.”

Clear rules apply

The information is either unclear, or originates from a market participant

Unknown

Country	VAT charged on GO trades?
AT	VAT is charged on GO sales
BE	VAT is charged on sale of GOs (except for very small turnovers)
CH	As of 1st July 2010, the following rules are applied: • No VAT is charged on a sale of GOs only (to avoid VAT fraud) • VAT is charged on a sale of GOs including the supply of electricity (bundle)
CY	GOs are not yet traded in Cyprus
CZ	Regular VAT is charged on domestic trades. No VAT is charged on international trades due to the EC Directive 2006 on reverse charging.
DE	VAT is charged on GO sales
DK	GOs are subject to VAT, but are not subject to the rules of the reverse charge mechanism. Energinet.dk invoices VAT on charges for issuing and administering the GO system. If issuing to EU account holders, Energinet.dk invoices according to the rules on reverse charging; and if issuing to account holders in non-EU countries, then Energinet.dk invoices without VAT
EE	Not known
ES	Not known

Country	VAT charged on GO trades?												
FI	VAT is charged on GO sales												
FR	VAT is charged on GO sales												
GR	There are currently no trade transactions of GO in Greece												
HR	We do not know if VAT will be charged on the sale of GOs in Croatia												
IE	SEMO would not have sight of the sale arrangements, as by law the issuing body is not allowed to be involved in trading. However, a market party said that VAT is charged if the buyer is in the same country – so if GOs are sold between Irish account holders, then VAT is charged; but if an Irish account holder buys from (e.g.) another EU country, then VAT is not charged (although they are informed of the VAT number of the seller so they can confirm that it is VAT registered).												
IS	VAT is charged on GO sales. However, exports of goods and services are exempt from VAT under the tax code so international GO sales are VAT exempt. Landsnet charges VAT for the issue of GOs.												
IT	<u>Account-holder VAT charging</u> <table border="0"> <tr> <td>Italian GO account holder with VAT number</td> <td>Yes (22%)</td> </tr> <tr> <td>Italian GO account holder without VAT number</td> <td>Yes (22%)</td> </tr> <tr> <td>Italian GO trader "frequent exporter" (article 8 DPR 633/72)</td> <td>No</td> </tr> <tr> <td>EU/Non-European GO account's holder with VAT number</td> <td>No</td> </tr> <tr> <td>EU GO account's holder without VAT number</td> <td>Yes (22%)</td> </tr> <tr> <td>Non-European account's holder without VAT number</td> <td>No</td> </tr> </table> These rules will shortly be updated.	Italian GO account holder with VAT number	Yes (22%)	Italian GO account holder without VAT number	Yes (22%)	Italian GO trader "frequent exporter" (article 8 DPR 633/72)	No	EU/Non-European GO account's holder with VAT number	No	EU GO account's holder without VAT number	Yes (22%)	Non-European account's holder without VAT number	No
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LU	Traders say they charge 6% VAT to end consumers, but VAT does not apply to purchases of GOs from other countries. VAT on energy prices is always 6% in Luxembourg.												
ME	There is currently no GO trade in Montenegro, and no information whether VAT will be charged												
NL	VAT is charged on GO sales												
NO	VAT is charged on GO sales												
PT	Not known												
SE	VAT is charged on GO sales												
SI	VAT is charged on GO sales												
UK	Not clear. VAT inspectorate does not know												