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Authorised certification schemes for foreign renewable gas certificates

in accordance with Article 8 paragraph 2 of the DETEC Ordinance on the Guaranties of Origin for Thermal and Motor Fuels

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1 Introduction

The Swiss guarantee of origin scheme for thermal and motor fuels (GO scheme) went into operation on 1 January 2025, replacing the gas industry's clearing house and taking on its responsibilities. Until now, the gas industry's clearing house has registered foreign certificates for renewable gases. The substances on which these certificates were based had to fulfil the environmental requirements of the 'Principles of the Swiss Gas Industry for Biogas and Other Renewable Gases'. Since 1 January 2025, importers of foreign certificates for renewable gases are responsible for registering them in the GO scheme. The renewable gases on which the imported certificates are based must still fulfil environmental requirements. It ought to be possible to provide proof of this via suitable certification schemes. A study¹ commissioned by the SFOE and the FOEN has analysed existing certification schemes that are relevant to Switzerland. It describes the extent to which these schemes are suitable for demonstrating that environmental requirements are fulfilled. The SFOE is adopting this directive based on the study. The directive designates and lists the foreign renewable gas certification schemes that are authorised in the GO scheme as proof that environmental requirements are fulfilled. Other certification schemes may be added to the list in future if they prove suitable. Updates to the list may be based on a periodic review of its contents or made at importers' request, if they provide evidence that a specific certification scheme may fulfil the legal requirements laid down in sections 2.1 and 3.1 of this directive in the same way as the already approved certification schemes.

The practical implementation of the transfer of foreign certificates into the Swiss GO scheme is described in the Pronovo system manual. The manual is available on the Pronovo website (the English translation will be available soon).

¹ Brandes Energie AG: Positivliste Zertifizierungssysteme für ausländische erneuerbare Gaszertifikate, Studienbericht vom 15. August 2024, i.A. des BFE und des BAFU + Ergänzung (only available in german).

2 Renewable gases from biogenic waste or production residues

2.1 Relevant legislation

2.1.1 Legal provision to be substantiated

In order for foreign guarantees of origin or other certificates for renewable gases from biogenic waste or production residues to be transferred to the GO scheme, they must meet the environmental requirements set out in Article 8 paragraph 1 letter a of the DETEC Ordinance on the Guaranties of Origin for Thermal and Motor Fuels of 20 November 2024² (GOFO). Article 8 paragraph 2 GOFO delegates responsibility for determining the proof needed to demonstrate compliance to the SFOE. This proof consists of certificates from schemes that are capable of confirming compliance with the environmental requirements for importing certificates for renewable gas fed into the grid. There are three different types of eligible certification schemes:

- Voluntary and national schemes that are recognised by the European Commission and are able to document the requirements in accordance with Article 8 paragraph 1 letter a COFO.
- Standards and quality seals that are able to document the environmental requirements in accordance with Article 8 paragraph 1 letter a COFO.
- Foreign registers, provided they impose equivalent requirements to Article 8 paragraph 1 letter a GOFO or offer the option to audit and document these requirements.

Section 2.2 lists the certification schemes that enable proof of compliance with the environmental requirements to be provided in a simplified manner. It may be the case that a combination of the above-mentioned schemes is necessary in order for the proof to be provided with certainty. Additional certification schemes may be approved, and in principle, it is possible for other forms of proof to be recognised in justified cases. However, this is subject to proof that the requirement criteria in section 2.1.2 are met in the same way. In such cases, the burden of proof lies entirely with the importer, who must demonstrate that the scheme verifies compliance with the requirements in an equivalent manner to the schemes mentioned in section 2.2. The importer must provide the SFOE and Pronovo with all documentation so that the verification can be traced and the result validated. This includes:

- Name/company of the auditor who verified the certificates.
- Proof that the auditor/company is accredited by a national accreditation centre as a conformity assessment body in the field of renewable gases from biogenic waste or production residues.
- Audit report of the auditor/company.
- Definition of waste on which the auditor/company based the audit.

² SR 730.010.2

2.1.2 Criteria for including a foreign certificate in the GO scheme

As stipulated in Article 8 paragraph 1 letter a GOFO, the renewable gas must be produced from biogenic waste or production residues in accordance with the state of the art. Waste or production residues as defined in the DGC positive list³ or by the country of production and substances listed in Annex IX of EU Directive 2018/2001⁴ fulfil these requirements. Intermediate crops are permitted as substrates if they are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained.

2.2 Authorised certification schemes

2.2.1 Voluntary and national schemes recognised by the EU

Schemes recognised by the EU in accordance with Article 30 paragraph 4 or 6 of Directive (EU) 2018/2001 verify whether renewable fuels fulfil EU sustainability criteria. Proofs of Sustainability (PoS) from the following recognised schemes are suitable for demonstrating compliance with the environmental requirements of the Swiss GO scheme.

Recognised scheme	Requirements to be fulfilled	
	The PoS must show that only wastes and residues ⁵ were used.	If intermediate crops are used, the PoS must show that the requirements of Annex IX ⁶ to EU Directive 2018/2001 are fulfilled.
International Sustainability and Carbon Certification (ISCC EU)	X	X
REDcert EU	X	X
Biomass Biofuels voluntary scheme (2BSvs)	X	X
Better Biomass	X	X
Sustainable Resources voluntary scheme (SURE-EU)	X	X
KZR INiG system	X	X
Roundtable on Sustainable Biomaterials (RSB EU RED)	X	X

X = The recognised scheme is able to provide information on fulfilment of the requirements.

o = The recognised scheme is unable to provide information on fulfilment of the requirements.

³ www.bazg.admin.ch > Information for companies > Domestic taxes and duties > Mineral oil tax > Biofuels > Publications > Directorate General of Customs positive list (de, fr, it)

⁴ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast), OJ L 328, 21 December 2018, p. 82, last amended by Directive (EU) 2024/1711 of the European Parliament and of the Council, OJ L, 2024/1711, 26 June 2024.

⁵ Waste or production residues as defined in the DGC positive list or by the country of production and substances listed in Annex IX of EU Directive 2018/2001 fulfil these requirements.

⁶ Intermediate crops are permitted as substrates if they are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained.

2.2.2 Standards and quality seals

Standards and quality seals refer to certification schemes (not recognised by the EU Commission) that assess the quality of systems or substances in accordance with their own certification guidelines or with the client's specifications.

Standard or quality seal	Requirements to be fulfilled	
	The PoS must show that only wastes and residues ⁷ were used.	If intermediate crops are used, the PoS must show that the requirements of Annex IX to EU Directive 2018/2001 ⁸ are fulfilled.
naturemade star	✓	X
TÜV SÜD Green-Methane standard	X	X

✓ = The standard or quality seal demonstrates that the requirements have been fulfilled.

X = The standard or quality seal is able to provide information on fulfilment of the requirements.

o = The standard or quality seal is unable to provide information on fulfilment of the requirements.

⁷ Waste or production residues as defined in the DGC positive list or by the country of production and substances listed in Annex IX of EU Directive 2018/2001 fulfil these requirements.

⁸ Intermediate crops are permitted as substrates if they are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained.

2.2.3 Foreign registers

Foreign registers are platforms that enable certificates of origin to be exchanged. They can be state-designated registers of certificates of origin or platforms set up on private initiative. The conditions that determine whether a certificate of origin from the relevant register fulfils the environmental requirements of the Swiss GO scheme or when additional proof is required are described below. A distinction is made between registers that issue GO in accordance with the principles and rules of the Association of Issuing Bodies (AIB) for the European Energy Certificate System (EECS) and transfer them via the AIB hub, and those that are based on other standards (e.g., CoO standard from ERGaR).

Registers with membership in the EECS Gas Scheme (AIB Gas Members)

Register	Requirements to be fulfilled	
	The certificate must show that only wastes and residues ⁹ were used.	If catch intermediate crops are used, the certificate must show that the requirements of Annex IX to EU Directive 2018/2001 are fulfilled.
Finnish Register at Gasgrid Finland	X	o
Czech Register at OTE	X	o
Spanish Register at Enagás (Gdogas)	X	o
Austrian Register at E-Control	X	o
Estonian Register at Elering	X	o
Latvian Register at Conexus Baltic Grid	X	o
Italian Register at GSE	X	o
Portugues Register at REN	X	o

⁹ Guarantees of origin issued in accordance with the EECS standard by AIB and bearing a fuel code in accordance with the list of "Accepted Fuel Codes" meet this requirement. The list is based on Fact Sheet 05 (Types of Energy Inputs and Technologies) of the EECS standard. This is available at: <https://www.aib-net.org> > EECS > Fact Sheets.

List of accepted Fuel Codes

Solid renewable input energy sources

- Biogenic municipal waste: F01010101
- Biogenic Industrial waste: F01010201

Liquid renewable input energy sources

- Municipal biodegradable waste: F01020100
- Black Liquor: F01020200
- Waste Plant Oil: F01020400

Gaseous renewable input energy sources:

- Landfill gas: F01030100
- Sewage gas: F01030200
- Agricultural gas:
 - F01030301
 - F01030302
 - F01030303
 - F01030304
 - F01030305
- Gas from organic waste digestion:
 - F01030401
 - F01030402
 - F01030403
 - F01030404
 - F01030405
 - F01030406
 - F01030408

Other Registers

Register	Requirements to be fulfilled	
	The certificate must show that only wastes and residues ¹⁰ were used.	If catch intermediate crops are used, the certificate must show that the requirements of Annex IX to EU Directive 2018/2001 ¹¹ are fulfilled.
German Biogas Register (dena register)	X	X
Biomethan Register Austria (AGCS register)	o	o
VertiCer register, Netherlands	X	o
Energinet biomethane register, Denmark	o	o
SPDD register, Slovakia	o	o
GGCS register, UK	X	X
RGO register, France	o	o

X = The register is able to provide information on fulfilment of the requirements.

o = The register is unable to provide information on fulfilment of the requirements. Import into the CH-CoO system is possible if additional proof (see previous table: PoS/Quality seal/Standard) can be provided that the requirement is fulfilled.

¹⁰ Waste or production residues as defined in the DGC positive list or by the country of production and substances listed in Annex IX of EU Directive 2018/2001 fulfil these requirements.

¹¹ Catch crops are permitted as substrates if they are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained

3 Renewable gases from renewable energy sources other than biomass

3.1 Relevant legislation

As laid down in Article 8 paragraph 1 letter b GOFO, renewable gas produced from renewable energy sources other than biomass must fulfil environmental requirements. The Federal Office of Energy is guided by the Delegated Regulation (EU) 2023/1184¹².

The SFOE sets out the requirements for the relevant proof in a directive (Art. 8 para. 2 GOFO). Renewable gas produced from renewable energy sources other than biomass must have a valid certificate from a recognised scheme as described in Article 30 paragraph 4 of Directive (EU) 2018/2001 and accompanying documentation showing that the gas is a renewable fuel of non-biological origin as defined in Article 2 number 36 of Directive (EU) 2018/2001.

3.2 Authorised certification schemes

Proofs of Sustainability (PoS) from the following recognised schemes are suitable for demonstrating compliance with the environmental requirements of the Swiss GO scheme:

- International Sustainability and Carbon Certification (ISCC EU)
- CertifHy
- REDCert

¹² Commission Delegated Regulation (EU) 2023/1184 of 10 February 2023 supplementing Directive (EU) 2018/2001 of the European Parliament and of the Council by establishing a Union methodology setting out detailed rules for the production of renewable liquid and gaseous transport fuels of non-biological origin, OJ L 157, 20.6.2023, p. 11.