



REGATTRACE

Renewable Gas Trade Centre in Europe

The Union Database

Matthias Edel

Target Workshop 20 October 2021 in Vilnius, Lithuania



2. The Commission shall ensure that a Union database is put in place to enable the tracing of liquid and gaseous transport fuels that are eligible for being counted towards the numerator referred to in point (b) of Article 27(1) or that are taken into account for the purposes referred to in points (a), (b), and (c) of the first subparagraph of Article 29(1). Member States shall require the relevant economic operators to enter into that database information on the transactions made and the sustainability characteristics of those fuels, including their life-cycle greenhouse gas emissions, starting from their point of production to the fuel supplier that places the fuel on the market. A Member State may set up a national database that is linked to the Union database ensuring that information entered is instantly transferred between the databases.

Fuel suppliers shall enter the information necessary to verify compliance with the requirements laid down in the first and fourth subparagraphs of Article 25(1) into the relevant database.

4. Member States shall have access to the Union database referred to in paragraph 2 of this Article. They shall take measures to ensure that economic operators enter accurate information into the relevant database. The Commission shall require the schemes that are the subject of a decision pursuant to Article 30(4) of this Directive to verify compliance with that requirement when checking compliance with the sustainability criteria for biofuels, bioliquids and biomass fuels. It shall publish, every two years, aggregated information from the Union database pursuant to Annex VIII to Regulation (EU) 2018/1999.



The Union Database (UDB) shall **improve the traceability of gaseous and liquid biofuels** as well as renewable fuels of non-biological origin with the objective to:

- avoiding double counting;
- facilitating the monitoring and reporting for voluntary schemes and Member States;
- mitigating the risks of irregularities and fraud.

Economic operators along the chain of custody shall enter information into the UDB (in real-time):

- Sustainability characteristics of the fuels;
- Transactions in relation to those fuels.

The EC intends to **start the operation** of the UDB by December 2022.

Supply chain scope (economic operators)

- Low Risk value chain (from collection point / Trader)
- High Risk value chain (from point of origin)

Sectoral and fuel scope

- RED II
 - Sector: Transport
 - Fuels: All liquid and gaseous fuels (biofuels, bioemthane and sustainable gases, H₂), RFNBO and recycled carbon fuels (RCF)
- RED III
 - Sector: Transport / Power & Heating & Cooling (RED III)
 - Fuels: All liquid and gaseous fuels that shall count towards the targets of the RED III

→ Under discussion: extension of UDB to demonstrate compliance with requirements with Monitoring and Reporting Regulation (MRR)

According to the **draft Implementing Act on Sustainability Verification** the connected European gas infrastructure shall be considered as one mass balancing zone.

In combination with the drafted mass balancing principle for the European gas grid, the following **questions** have been raised:

- Is it necessary to document / enter information about intermediate steps (e.g. change of ownership, capacity bookings at interconnection points) between injection and withdrawal of biomethane?
- Does it suffice to prove mass balancing with injection and withdrawal?
- What is the role of existing database/national registries?

Gas GOs shall enter the UDB only, if

- GOs are cancelled
- A Proof of Sustainability is available for the corresponding fuels

- Expectations towards the Union Database are high

rechtssichere Möglichkeiten für die **Anrechnung von in anderen EU-Mitgliedsstaaten ins Gasnetz eingespeistes**, regenerativ erzeugtes Methan zu prüfen. Aufbauend auf den bisherigen Systemen zur Verwendung von Massenbilanzen sowie zur Rückverfolgbarkeit sollte nach **Einrichtung einer Unionsdatenbank** durch die EU die „Dienstvorschrift zur Überwachung der Einhaltung der Treibhausgasminderung nach § 37a Absatz 4 des Bundes-Immissionsschutzgesetzes“ (DV-THG-Quote) zeitnah entsprechend angepasst werden. Der Deutsche Bundestag fordert die Bundesregierung in diesem Zusammenhang ferner dazu auf, sich auf EU-Ebene für eine zügige Einrichtung der Unionsdatenbank einzusetzen.“

- Open issues are big in number



Thanks for your attention!

Matthias Edel (ERGAR)
edel@ergar.org

www.regatrace.eu

