

# Summary of the evaluation of national systems for guarantees of origin for electricity from renewable sources (GO) and for electricity labelling for the purpose of a decision on the recognition of imported guarantees of origin on behalf of the Federal Environment Agency (UBA)

## Austria

### Introduction

The German Federal Environment Agency (UBA) currently examines whether guarantees of origin for electricity from renewable sources (GO) from other Member States of the European Union and other states can in principle be recognised under Article 19 Directive (EU) 2018/2001 (RED II). The evaluation of the legal and practical implementation of the national systems for guarantees of origin and for electricity disclosure is supported by a consortium of external contractors (Öko-Institut e. V. and Becker Büttner Held PartGmbH (BBH)).

### General

As of 13 December 2023, the assessment of the available information on system-related issues does not lead to general reasonable doubts about the reliability or veracity of GOs issued in and imported from Austria, so that, in accordance with Article 19 RED II, there currently appears to be no reason for not recognising such GOs.

### Specifics

Austrian GOs fulfil (partly with minor restrictions) **all criteria according to Article 19 of RED II**.

EECS GOs are issued for the **standard size of 1 MWh** net electricity generation, while for “national GOs” which are not eligible for export a subdivision down to a size of 1 kWh is possible. In electricity disclosure, renewable sources are clearly distinguished from other electricity sources. **Electricity from renewable sources can only be disclosed on the basis of GOs that are subsequently cancelled**. As Austria has also implemented a disclosure system based on GOs for non-renewables, Austria does not have a residual mix. With regard to the different applicable subsidy systems, it is ensured that **the value of any exportable GO is sufficiently taken into account** in line with the RED II.

GOs for renewable electricity generation from high-efficiency cogeneration are issued by E-Control as **combined RES-CHP GOs**.

GOs are not used to achieve the mandatory targets according to Article 3 RED II for renewable energy, nor do they affect the calculation of gross energy consumption.

GOs have to be used in the sense of transfer, export and, finally, cancellation within a period of 12 months after the end of the production period. The production period is usually one month (except for small photovoltaic plants). GOs which are not used in that manner expire 18 months after the end of the generation period.

The Austrian regulatory authority E-Control is the **only body** in Austria responsible for issuing GOs. It is **independent of production, trade and supply**.

The rules in force in Austria, and in particular the EECS Rules which are applied, ensure an **accurate, reliable and fraud-proof issuance, transfer and cancellation of GOs**. There is no indication that E-Control is in breach of these rules. In particular, it is ensured that GOs are used only once, and that the registry technically avoids further use of the GO after cancellation, expiry or export of the GO.

GOs are **issued for the net production of electricity** (excluding self-consumption) used by final consumers. For electricity produced in pumped hydro installations, a share of 25% is deducted in order to account for pumping losses. The amount of net production is verified based on **meter readings obtained from the grid operator**. For the special case of issuing GOs based on the conversion of GOs, input and output data has to be confirmed by an auditor on an annual basis. The Austrian regulations contain provisions both for the correction of incorrect GOs and for incorrect or outdated registered data of generation plants.

Austrian GOs contain **all the information required by Article 19(7) RED II**.

Therefore, there are currently no reasonable doubts about the accuracy, reliability or veracity of the Austrian GOs in relation to system-related issues. Thus, Austrian GOs can usually be recognised.

#### **Critical aspects**

None.

#### **Reasons for non-recognition**

None.

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#### **Imprint**

##### **Publisher**

Umweltbundesamt  
Wörlitzer Platz 1  
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**Completion:** 12/2023