



Paris, November 21, 2022

## **CEER PC on « Greenwashing » »**

### **I – HOW TO PROVIDE ACCESS TO ADEQUATE AND RELIABLE INFORMATION TO CONSUMERS ?**

#### **RECOMMENDATION 1**

**“All comparison tools (CTs) – in particular those operated or trust marked by a public authority or body – should provide a clear indication of the product mix and supplier mix for each product fixed in the comparison tool. If offers are claimed as “green” by CTs (and/or suppliers), the justification for doing so (as source of information) must be transparent ton consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ is attentive to ensuring that consumers have complete and reliable information on the energy mix of the various offers presented as green, mainly if this information is presented on independent Comparison Tools controlled by public the authorities. This information must be consistent across all Member States.

Offers qualified as green must, at a minimum, mention the percentage of green electricity or gas they contain.

On the other hand, the consumer does not necessarily need to know the amount or the share of public support from which the offer that is proposed to him has benefited.

#### **RECOMMENDATION 2**

**The National Authority (NRA) (or other competent body) should cooperate a European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers’**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ is in favor of harmonizing the information provided to consumers throughout Europe, according to dispositions to be put in place by European regulators.



### **RECOMMENDATION 3**

**“References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country of, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers attention (e.g. on the website of the supplier and/or the competent body for disclosure).**

**Is this recommendation sufficient ? Please share your suggestions and comments**

The information on State aid incorporated in the price offers does not seem to us to be an essential element of transparency. UPRIGAZ considers that the information that must be brought to the attention of consumers in the GOs on the origin of electricity or renewable gas can be limited to the country (and possibly the region) of production of electricity or gas. Information on the precise place of production seems to us to be of no real interest for the majority of consumers.

## **II – HOW TO STRENGTHEN CONSUMER TRUST BY IMPROVING THE EXISTING DISCLOSURE SYSTEMS ?**

### **RECOMMENDATION 4**

**“Member States should have a GO system in place for electricity , gas, including hydrogen ; or heating or cooling. For this purpose, national GO system convergence should be encouraged so that Gos are easily tradable across Member States. When and where available. Gos should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy), in the absence of a proper GO the offer cannot be marketed as “green”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ considers as very important to strengthen consumer’s confidence in the information given to them by suppliers on the origin of the energy they consume. The GOs must be the only tool used to justify the origin of the energy consumed. It seems logical that, at least in a first period, we should focus on three categories of GOs: renewable electricity GO, hydrogen GO and biomethane GO. On the other hand, each of these categories must be subject to extensive harmonization in Europe so that a GO issued in Denmark, for example, is comparable to a GO issued in France or Spain.

### **RECOMMENDATION 5**

**“GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to gas, including hydrogen or heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form or energy disclosed. This should be facilitated with the use of a common platform.**

**Is this recommendation sufficient ? Please share your suggestions and comments**



UPRIGAZ subscribes to the proposal to identify areas for improvement of the GOs by insisting on the reliability of the information attached to the GOs. On the other hand, it seems to us that this information should not be too detailed because it would harm the readability of the GOs.

### **RECOMMENDATION 6**

**Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ is in favor of the harmonization at European Union level of information attached to GOs. This harmonization seems essential to us both to improve consumer confidence and to develop an European system for exchanging GOs on an organized market.

### **RECOMMENDATION 7**

**“In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis.**

**Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ considers that the GOs attributable to electricity must relate to renewables. Electricity of nuclear origin cannot benefit from the same guarantees of origin as renewable energies. The consumer must, in particular, be able to be informed that the electricity he consumes contains a component of thermal or nuclear origin.

### **RECOMMENDATION 8**

**“The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non—supported installations should be shared publicly and be easily accessible”.**



**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ considers that the gradual integration of the gas and electricity markets will not have an impact requiring a revision of the GO mechanism, except to consider that the gas market will very quickly turn green with the integration of biomethane and hydrogen. Even in this situation, it seems logical to us to dissociate GOs ENR electricity from GO biomethane or hydrogen. Moreover, as indicated in our response to point 1, UPRIGAZ considers that the consumer does not necessarily need to know the amount or the share of public support from which the offer offered to him has benefited.

### **III – HOW TO PROVIDE CONSUMERS WITH TRANSPARENT INFORMATION ?**

#### **RECOMMENDATION 9**

**“Consumers should be able to choose “local or regional” GOs, issued for local energy production close to the consumer’s consumption point”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ is not in favor of the multiplication of GO types, such as specifying that the energy attached to a GO is produced locally.

#### **RECOMMENDATION 10**

**“GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers’ understanding of the energy market.**

**Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions).**

**An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged.**

**Labels should encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer’s trust”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

UPRIGAZ unreservedly subscribes to the distinction between GOs and labels. Labels do not necessarily guarantee objective information for consumers and there is a risk that the generalization of labels will reduce the trust that consumers must place in GOs and devalue them.



## **RECOMMENDATION 11**

**“When subscribing to an offer claimed as “green” by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed”.**

**Is this recommendation sufficient ? Please share your suggestions and comments**

It is up to the competition and consumer protection authorities in each Member State to ensure the accuracy of the information provided by suppliers on the green offers tendered to consumers.