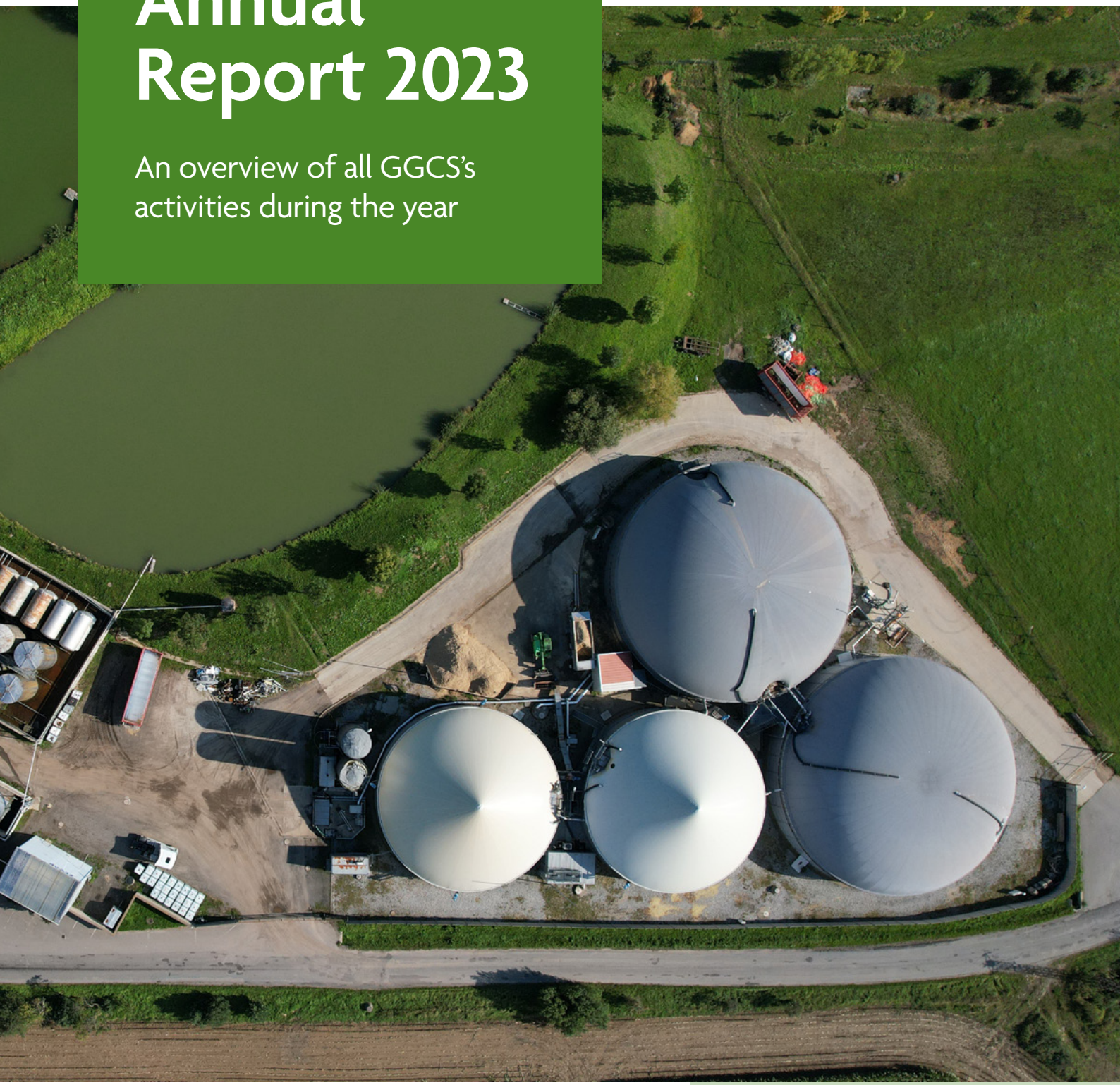
GreenGas
CERTIFICATION SCHEME

Annual Report 2023

An overview of all GGCS's activities during the year



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Introduction

Our annual report shows the trends in the green gas market in the previous year and gives an overview of how the Green Gas Certification Scheme has developed.

We hope it will be of interest to existing participants and potential entrants to the biomethane (or green gas) sector, whether you are a producer, trader, consumer, or regulator.

We invite you to contact us to discuss anything within this report.

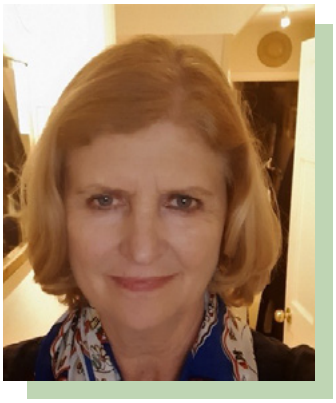
About REAL

Renewable Energy Assurance Limited (REAL) carries out a range of certification and consumer protection activities all of which promote renewable energy and the circular economy.

Set up in 2006, REAL is a wholly owned subsidiary of the Association for Renewable Energy and Clean Technology (REA), the largest renewable energy and associated clean technology body in the UK. GGCS is one of the REAL family of schemes.

A word from the REAL Chief Executive

2023 was a year of growth with the number of biomethane plants on the Scheme passing 100. The number of traders on the Scheme also passed 100 as the biomethane market continued to reach new parts of the energy trading sector.



At the same time there were challenges, with a number of suppliers exiting the market and natural gas prices at record levels for long parts of the year. The volume of Renewable Gas Guarantees of Origin retired in the year dropped from the high of 4.4 TWh in 2022, to a still healthy level of 3.4 TWh in 2023.

We continue to navigate a complex policy landscape at the international and European level. During the year we worked hard to get our members' voices heard by those redeveloping the Greenhouse Gas Protocol and the Science Based Target Initiative. At the same time we continued to monitor the development of the Union Database for Biofuels.

In the UK we maintained our status as an Approved Certification Scheme within the Green Gas Levy. We look forward to continuing our work with policy-makers looking at how the GGCS can support the Government's ambitions to grow the green gas sector.

After a detailed tender process to select a new IT provider I am pleased to say that we will soon move the GGCS Registration Database to the G-REX platform operated by Grexel. This platform is already used by a large number of renewable energy certificate systems across Europe. We are confident that their product will provide GGCS members with a much improved functionality and user experience.

I pay tribute to the hard work of the GGCS Team Members who have overseen the continuing expansion and development of the Scheme. The smooth running of the Scheme depends on them.

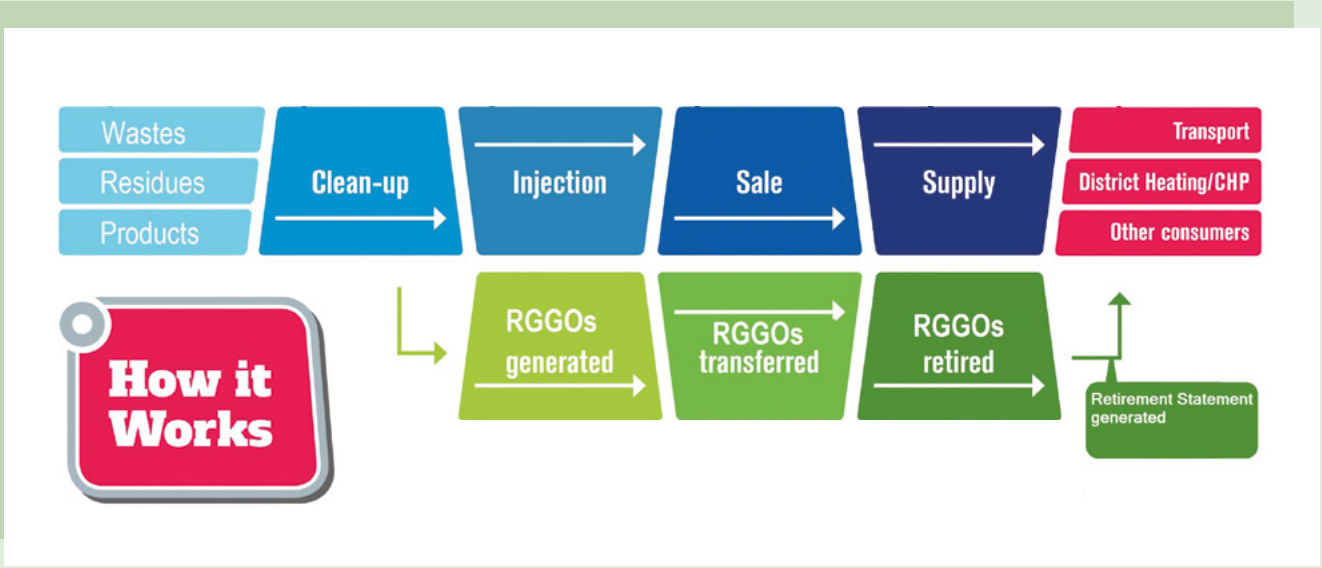
Virginia Graham OBE
REAL Chief Executive

Abbreviations

gCO_2e	Grammes of Carbon Dioxide Equivalent
GWh	Gigawatt Hour (measured at the Higher Heating Value)
GGCS	Green Gas Certification Scheme
GGSS	Green Gas Support Scheme
GoO	Guarantee of Origin
GHG	Greenhouse Gas e.g. CO_2, CH_4, SF_6, etc.
GHGP	Greenhouse Gas Protocol
I&C	Industrial and Commercial
kWh	Kilowatt Hour (measured at the Higher Heating Value)
MJ	Megajoule (1 kWh = 3.6 MJ) (measured at the Higher Heating Value)
NDRHI	Non-Domestic Renewable Heat Incentive
RGGO	Renewable Gas Guarantee of Origin
RTFO	Renewable Transport Fuel Obligation
TWh	Terawatt Hour (measured at the Higher Heating Value)

How the GGCS works

The GGCS issues, tracks, and retires Renewable Gas Guarantees of Origin (RGGOs) within a secure account-based online database.



As shown in the diagram, RGGOs sit alongside the physical production, transport, and consumption of green gas. As green gas is mixed with fossil gas in the grid it cannot be physically tracked. However, RGGOs provide a method of matching gas consumed from the grid with units of green gas that are injected, ensuring they are only counted once and allocated to one consumer.

The process starts with a green gas producer submitting a package of evidence to the GGCS, showing the amount of gas they have injected, the inputs into the processes e.g. food waste or crops (categorised under wastes, residues, and products), and that relevant sustainability criteria have been met.

Once the RGGOs are issued in respect of green gas injected, they can be transferred to a trader account and then onwards to other trader accounts as desired.

When allocated to a green gas consumer, or group of consumers on a green gas tariff, RGGOs are retired and listed on a Retirement Statement.

This statement is provided to the consumer in the form of a PDF file which shows them the RGGOs that have been allocated to them. These statements are used as evidence that consumers are using green gas and allow them to report greenhouse gas (GHG) savings.

Retirement Statements can be verified as genuine by entering a unique pin number into the GGCS website.

By carefully controlling the number of RGGOs issued, and by ensuring that they are retired at the point they are allocated to a consumer, the GGCS protects against double counting and allows consumers to buy green gas with confidence.

Biomethane production and RGGO issuing in 2023

At the end of 2023, approximately 110 biomethane-to-grid plants in the UK were registered with GGCS. During 2023 the other biomethane registry working in the UK wound down its operation. This meant that all active biomethane plants became GGCS members.

This wide range of producers meant we could provide traders, suppliers, and customers with the opportunity to source green gas at the volumes, vintages, and feedstocks they require.

RGGOs have been issued in respect of 3,400 GWh of gas injected during 2023 and we estimate this total will rise to over 4,000 GWh as producers continue to register gas from the later part of the year.

Wastes and residues were used as the biomass input for over 50% of the RGGOs issued.

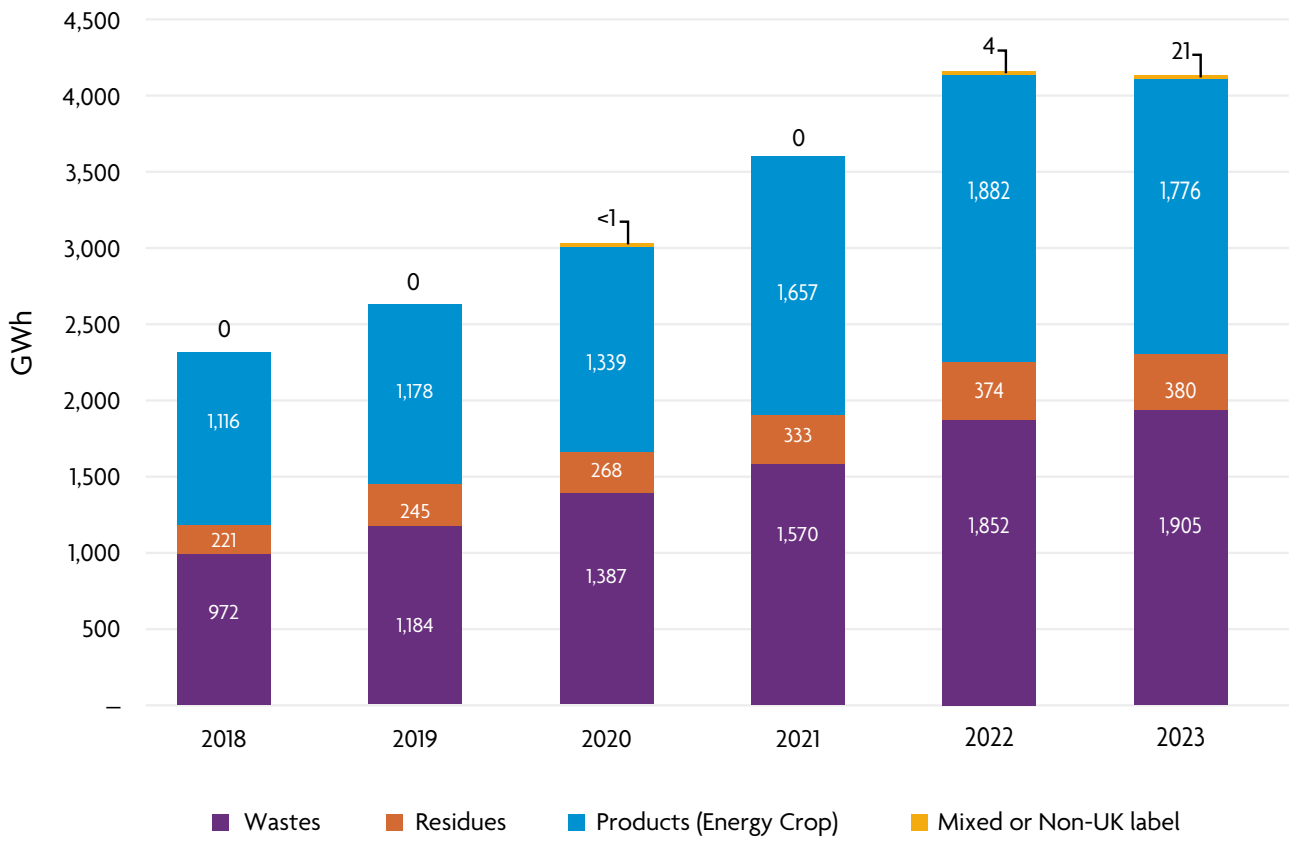


Figure 1 - GWh of RGGOs issued by feedstock type (as of Feb 22nd 2024)[1]

Prospects for growth

Despite the fact that the NDRHI closed to new applicants in 2021 there are still a number of projects that are in the process of build and commissioning under the support mechanism. We expect to see approximately five of those plants start to produce gas in the year ahead.

Progress with the development of plants under the Green Gas Support Scheme (GGSS) has been slow and there was only one plant operating under the GGSS in 2023. However, the Government's GGSS mid-scheme review decision, announced earlier this year, extended its timeline to 31 March 2028 to provide sufficient time for prospective applicants to commission on the scheme before it closes, increasing the likelihood of more plants coming online in the next few years.

In 2023 the Government published an updated biomass strategy. Their modelling points to the potential for 30-40 TWh of biomethane production in the UK. They are continuing to develop their plans for a successor mechanism to the GGSS that will support the long-term growth of biomethane production in the UK and, at the time of the report publication in Summer 2024, a call for evidence has been held on possible routes for that support.

1. GGCS commonly uses payment evidence of Ofgem's subsidies to issue RGGOs. Due to Ofgem's quarterly claim cycles, it could be that a batch of RGGOs injected in December 2023 would only have its payment approved by February/mid-March 2024. Furthermore, new joiners might make back-dated claims. These combined factors mean that the volume of RGGOs issued for 2023 may rise over time, which is why the snapshot has been dated.

Biomethane traders

The number of trader accounts continued to grow during the year bringing the total to 112 at year end.

Traders offer a diverse range of services to our producer members, providing them opportunities to sell their RGGOs in one-off transactions or via multi-year agreements, as well as the potential to be supported through ISCC Certification and have RGGOs transferred to the DENA Biogasregister in Germany and other members of the ERGaR Certificate of Origin Scheme.

The full spectrum between individual brokers and large multinationals are represented in the membership and a full list of trader accounts is available on our website here – www.greengas.org.uk/certificates/for-sale

Consumers and RGGO retirements

RGGOs are retired when purchased by a gas consumer, either individually or via a tariff, or when they are transferred to another biomethane registry (such as DENA).

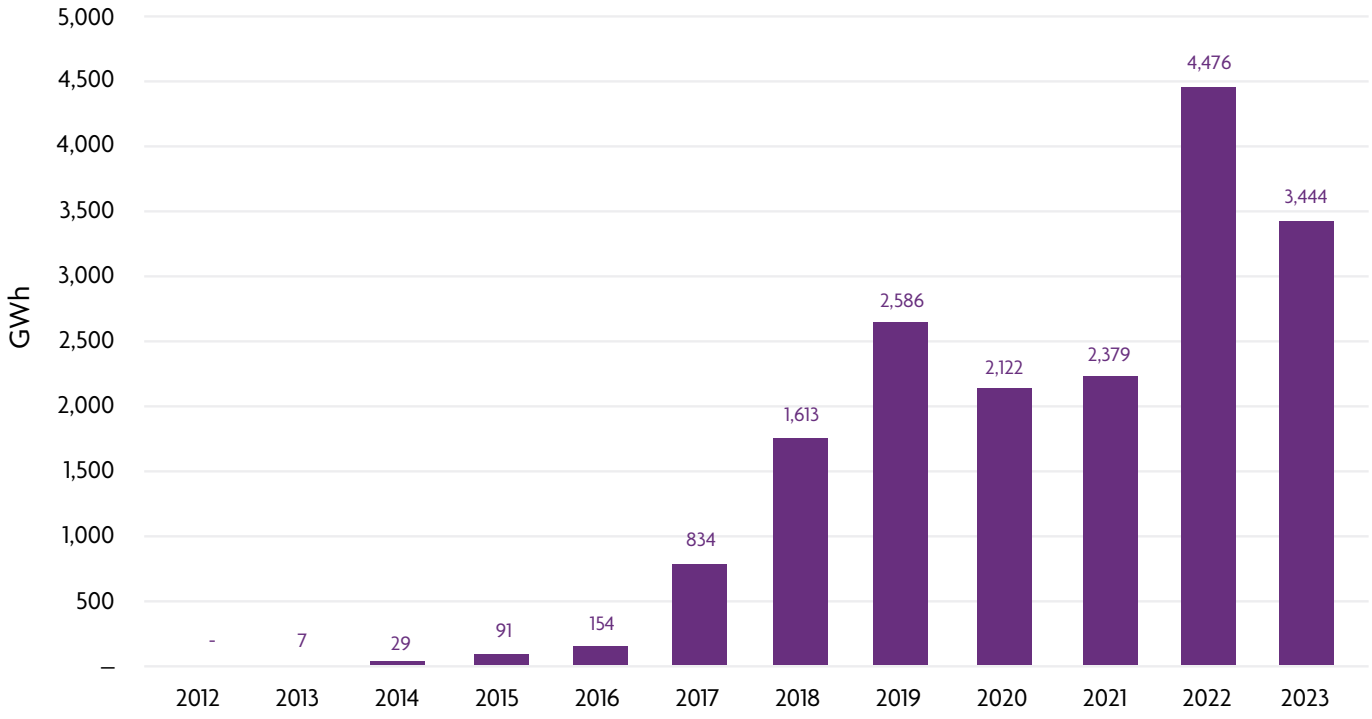


Figure 2 - RGGOs retired each year

Top line trends

Year-on-year volumes of RGGOs retired fell from their historic high in 2022, but they remain above the levels seen in previous years. Below we explore where that demand came from, sector by sector.

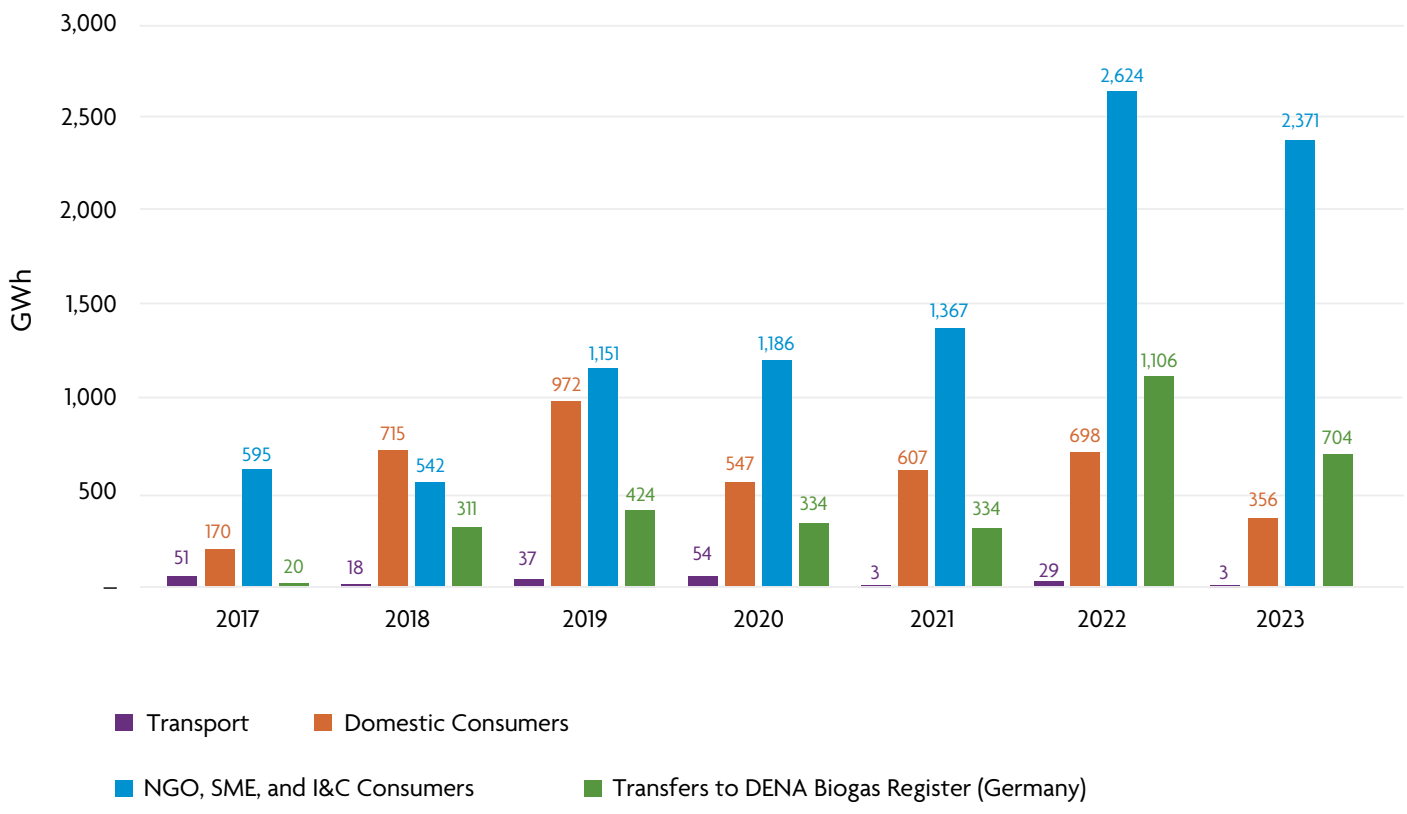


Figure 3 - RGGOs retired by sector and year

Transport

RGGOs allocated to transport are based on biomethane that has received the NDRHI and are generally used for voluntary emission reporting purposes, or for the provision of a green gas tariff at public fuelling stations outside the UK. RGGOs can also be allocated to buses and a small benefit claimed from the Government as part of the Bus Service Operators Grant (BSOG). These volumes do not reflect the amount of biomethane awarded Renewable Transport Fuel Certificates (RTFCs), which are often used for imported biomethane that does not have a RGGO attached.

Demand from the transport sector remained low in 2023, down from the small uplift seen in 2022.

Domestic consumers

There are five green gas tariffs on the UK market, a number that has remained steady after declines in 2022 due to the turbulence in the energy market. There remains a healthy market for green gas in non-UK domestic tariffs (we have included those where we believe the majority of their consumers are domestic).

Non-Domestic consumers (NGO, SME, and I&C)

The non-domestic sector contracted slightly compared to its peak in 2022, but shows an upwards trend compared to 2019-2021 figures (see Figure 4). The number of individual consumers in 2023 was the highest seen yet at 502.

This sector remains the primary driver of RGGO retirements and reflects continued demand from UK and non-UK NGO, SME, and I&C consumers.

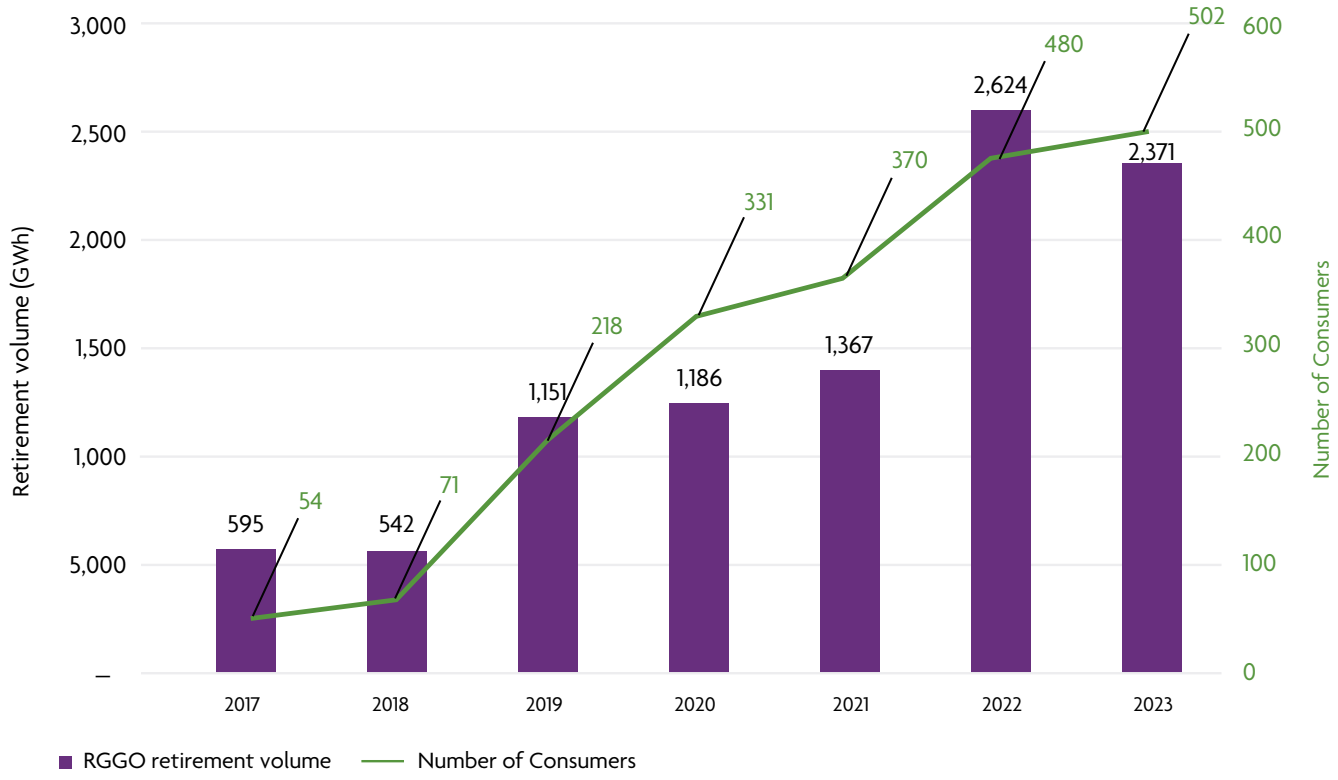


Figure 4 - NGO, SME, and I&C RGGOs retirement volumes with number of individual consumers

Figure 5 shows the percentage of the total retirements in the non-domestic sector by the ten largest consumers. Each of these "top ten" consumers retired 30 GWh of RGGOs or more. The total retirements by the "top ten" were the highest of any year to date, at over 1.6 TWh. Meanwhile the total for all individual consumers fell from 2022, leading the "top ten" to represent a larger percentage share of the market. This share was closer to that seen in 2018-2020 and can be significantly affected by one or two large consumers entering or leaving the market.

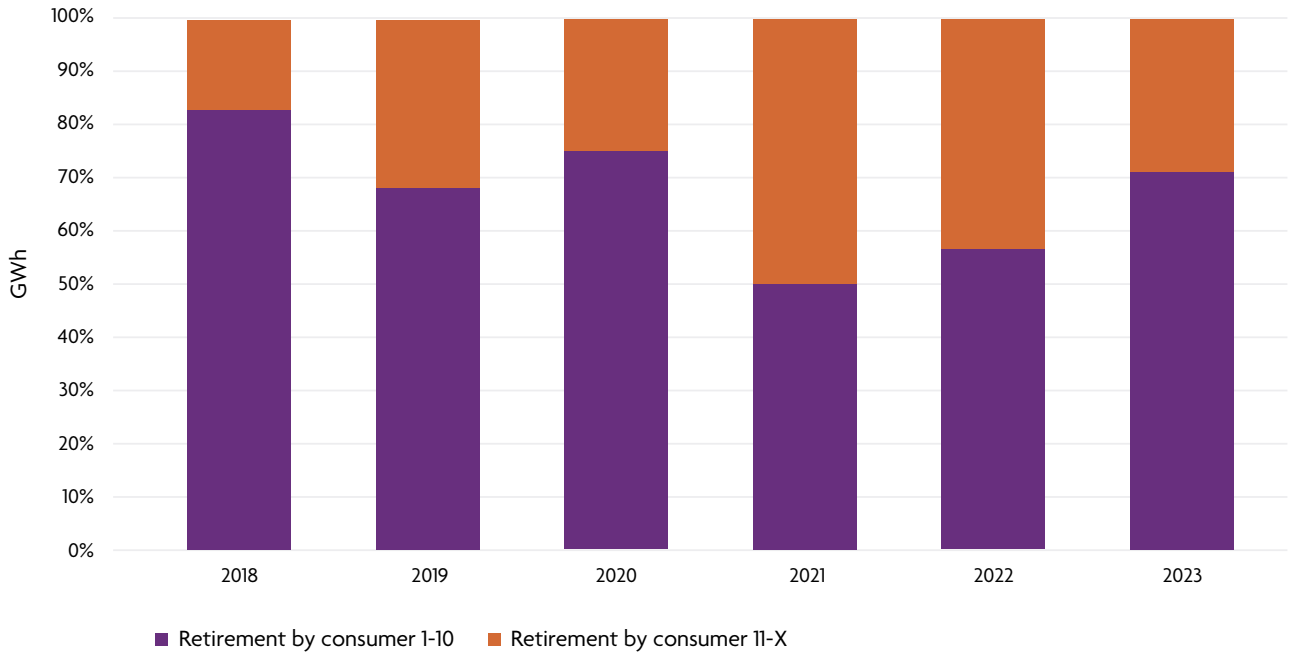


Figure 5 - Percentage of non-domestic RGGO retirements from top ten largest consumers

Exports to DENA

The volume of RGGOs transferred to DENA fell by approximately 37% compared to 2022 to around 700 GWh, representing around 21% of all RGGO retirements during the year. The GGCS does not receive a breakdown of the types of end consumers purchasing RGGOs that have been transferred, so we are unable to analyse this data further.

Since September 2021 transfers to DENA have been conducted via the ERGaR Certificate of Origin Scheme which has improved the efficiency of the transfer process.

2023 saw the import of a small batch of MWh of RGGOs from VertiCer in the Netherlands.

There were no exports to any other registries during the year.

How is green gas produced?

The GGCS currently issues RGGOs for two types of green gas – biomethane and biopropane.

Biomethane

Biomethane is produced by the anaerobic digestion (AD) of various wastes, residues, and crops. The "raw biogas" produced is put through an upgrading process which removes any impurities and splits the methane from the carbon dioxide (CO_2).

The methane is carefully monitored for purity, and, in most cases, propane (typically of fossil origin) is added to bring it up to the calorific values required. It is then injected into the gas network.[2]

The CO_2 stream is generally vented to the atmosphere[3], but some plants capture it for use in the food industry or in nearby greenhouses to encourage faster plant growth. In the coming years we expect that the biomethane sector will continue to pioneer bioenergy combined with carbon capture and utilisation or permanent storage (BECCUS) which is key to the UK meeting its carbon targets.[4]

The types of feedstocks AD plants use (waste, residue, or crops) are listed on our website. The majority of plants (63 of 110) use a range of inputs – mixing locally grown crops and sources of wastes and residues. A smaller number (40) only use wastes and residues, which include sources such as sewage, domestic and commercial food waste collection systems, or the "leftovers" from food and drink manufacturing such as dairy processing or brewing and distilling. A small number (7) use only crops (described as Product/Co-Product in the Non-Domestic Renewable Heat Incentive (NDRHI) and Green Gas Support Scheme (GGSS)).

Plants commissioning since 2018 under the NDRHI or GGSS have had a "crop cap" which means that biomethane produced in an AD plant with more than 50% crop feedstock does not attract government support. This makes it unlikely that more crop-only plants will be built in the future.

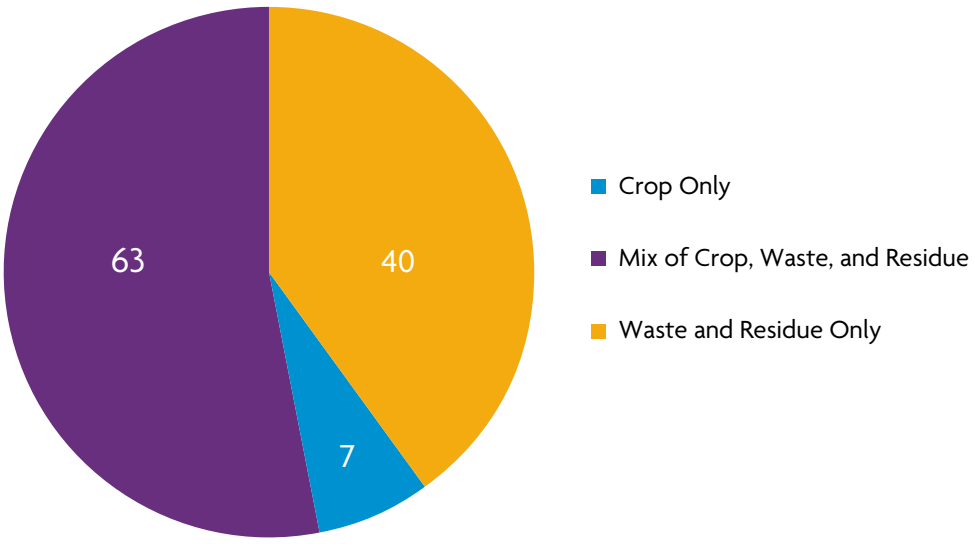


Figure 6 - Number of Biomethane Producers by input type

2. RGGOs are never issued for the kWh of fossil propane injected into the grid.
3. Note that this CO_2 is part of the biogenic short term carbon cycle and does not add to atmospheric concentrations of CO_2 as the combustion of fossil fuels does.
4. https://www.theccc.org.uk/publication/sixth-carbon-budget/

Biopropane

Biopropane (also called bioLPG) is a by-product in the manufacturing of biodiesel from vegetable oils using a refining process. It is produced by Neste in Rotterdam and Phillips 66 in the UK.

Both Calor and Flogas allocate the biopropane to its customers by means of the RGGOs we issue.

The GGCS issues and trades biopropane separately from RGGOs for biomethane. Information and statistics provided in this report relate to RGGOs issued for biomethane unless otherwise specified. More information about biopropane can been found in the link provided above.

Incentives for green gas production

The main sources of revenue for green gas producers are income from the sale of their gas and from government incentive schemes, being either the NDRHI, the GGSS, or the RTFO (Renewable Transport Fuel Obligation)[5].

The sale of RGGOs provides a further revenue stream for producers. This additional income is recognised within the Government's Impact Assessment of the Green Gas Support Scheme as being integral to the production model.

GGCS believes that RGGO income complements government support, allowing the subsidy to go further than it would otherwise, and encourages the production of additional volumes of green gas. We provide more information on this "additionality" concept on our website.

Sustainability criteria

The GGCS operates according to a set of Scheme Rules that set out criteria on which gases qualify as green and may be issued with RGGOs. These Rules state that it should be demonstrable that the gas must either be:

1) "a gas produced from a renewable source, where the GHG emissions from its production and consumption are calculated according to a recognised methodology and are within a recognised threshold...representing a GHG saving in comparison to the production and consumption of equivalent fossil products"; or

2) "a gas from a non-renewable source, where the GHG emissions from its production and consumption are calculated according to a recognised methodology and are within a recognised threshold...representing a GHG saving in comparison to the production and consumption of equivalent higher carbon fossil products, or a saving against the GHG emissions related to the alternative disposal of the materials used to generate such a gas".

These Rules are followed by issuing RGGOs for biomethane that has been shown to meet the sustainability criteria of:

1) The Directives of the European Parliament and Council (the Renewable Energy Directive); and

2) Sustainability criteria within UK government support mechanisms such as:

    a. the non-Domestic Renewable Heat Incentive (NDRHI);
    b. the Green Gas Support Scheme (GGSS);
    c. the Renewable Transport Fuel Obligation (RTFO); and
    d. the Low Carbon Hydrogen Standard (LCHS).

5. https://www.ofgem.gov.uk/environmental-and-social-schemes/green-gas-support-scheme-and-green-gas-levy
https://www.gov.uk/guidance/renewable-transport-fuels-obligation

The NDRHI rules require the GHG emissions from the production of biomethane, up until the point of injection, to be no more than 125 gCO_2e/kWh[6], representing a 60% reduction of average emissions for the delivery of a kWh of heat to a consumer in Europe.

In the vast majority of cases, biomethane production will be comfortably below that threshold e.g. 110 gCO_2e/kWh and below, and when using waste and residues as inputs, emissions of 35-70 gCO_2e/kWh are typical.

The first biomethane plant to receive the GGSS[7] was commissioned in 2022 and this producer and subsequent GGSS producers, must achieve at least a 70% GHG saving, making the threshold 86.4 gCO_2e/kWh[8]. Under the GGSS plants will be able to average the emissions across all their feedstocks rather than calculating them on a feedstock-by-feedstock basis as they do for the NDRHI.

In addition to meeting a GHG threshold, the NDRHI and GGSS also require that feedstocks must not be grown on land converted from uses with high biodiversity or carbon storage value, such as peatland or forest.

Each year GGCS producers must provide us with independent audits which show that they have met the NDRHI or GGSS sustainability criteria, or, in any instance where NDRHI or GGSS was not claimed, that an equivalent set of criteria were met, such as those set out within the RTFO.

The GGCS publishes a guidance document on the Environmental Benefits and Impacts of Biomethane which is available here.

Reporting green gas use

The GGCS works to improve the clarity and consistency of reporting rules related to government and non-governmental frameworks for greenhouse gas (GHG) reporting. Our aim is to achieve greater recognition of the benefits of sourcing renewable gas supplies as part of corporate climate action plans. Depending on the type of consumer, green gas use may be reported against different sets of criteria and methodologies. We support our members and interested consumers with a range of advice and guidance documents, specific to their situation.

Domestic consumers do not usually report the GHG emissions associated with their energy use. However, it is important they are provided with clear and accurate information regarding the way in which their gas use is matched to green gas production, on the basis of issuing and retirement of RGGOs.

GGCS Scheme Rules require that members must be "honest and transparent when marketing green gas" and that they "put in place robust processes to ensure that they are meeting their commitments to End-Use Consumers signed up to that tariff, by retiring an appropriate quantity of RGGOs". We back that up by requiring members to regularly provide evidence of how they have met those rules.

The GGCS continues to be used as an "Approved Certification Scheme" within the Government's Green Gas Levy framework. This is in addition to the recognition of GGCS RGGOs in determining derogations from Ofgem's energy price cap.

We continue to believe that green gas should be fully incorporated into the green tariff framework administered by Ofgem. There was a summary of responses in July 2023 from the Government to their 2021 call for evidence on "Designing a framework for transparency of carbon content in energy products" which did not give a strong indication of the details of what they may look like, but kept the door open for further consultation and discussion.

6. Equivalent to 34.80 gCO2e/MJ. 1 kWh = 3.6 MJ. gCO2e/kWh are always calculated against the lower heating value of methane.
7. https://www.ofgem.gov.uk/publications/green-gas-support-scheme-guidance
8. Equivalent to 24 gCO2e/MJ.

Non-domestic consumers range in scale from small independent businesses through to multinational corporations, NGOs, and the wider public sector such as universities. Increasing numbers of these organisations are adopting carbon reduction targets as part of sector pledges e.g. Delivering a Net Zero NHS, or individual corporate commitments on climate change. There is a range of statutory and voluntary emission reporting methods and obligations that apply to different groups of consumers.

The most widely used international reporting methodology is the Greenhouse Gas Protocol (GHGP) and we have produced guidance on the use of RGGOs within the protocol which is available here – www.greengas.org.uk/news/ggcs-guidance-documents.

The GHGP links to a range of emissions reporting and disclosure schemes such as the CDP and the SBTi and consumers are recommended to take the advice of any carbon consultants and auditors they employ to help them understand how RGGOs can be used within these schemes. The news section of our website contains information on the latest developments in this area - News - Green Gas Certification Scheme.

We have also published guidance on the Streamlined Energy and Carbon Reporting (SECR) rules, which makes it mandatory for large UK companies to report their greenhouse emissions to the Government.

There are several areas of emissions reporting where RGGOs are not yet recognised as evidence of green gas use including:

- The UK Emissions Trading Scheme (UK ETS)
- The EU Emission Trading Scheme (EU ETS) (with exceptions in a limited number of member states)
- Climate Change Agreements
- Climate Change Levy
- Low carbon building and planning regulations

Maintaining a robust scheme

The GGCS is administered by Renewable Energy Assurance Limited (REAL), a subsidiary of The Association for Renewable Energy and Clean Technology (REA).

Over the last decade REAL has developed a reputation for integrity and transparency in administering a variety of codes and schemes within the renewables and organics sectors.

REAL maintains ISO 9001 certification for its management systems, providing further evidence that it operates according to a clear set of principles and structures.

Because of our extensive efforts to maintain the highest standards, the GGCS has been able to maintain our status as an "Approved Certification Scheme" by the UK Government[9]. This status allows suppliers to use our Scheme to ensure compliance with the Green Gas Levy where they have requested an opt-out based on their supply of renewable fuel.

Rules and guidance

The GGCS is administered according to our Scheme Rules which are published on our website – www.greengas.org.uk.

The Scheme Rules require REAL to administer the Scheme in a fair and equitable manner and require Scheme Participants to be fair and transparent in their marketing of green gas.

The GGCS operates a whistleblowing policy to ensure that any concerns can be dealt with in the appropriate manner.

Member oversight

The Scheme Rules provide for the Scheme to be monitored by an Oversight Panel composed of its members. The Panel met in May and November 2023 with members providing feedback on a range of issues as well as agreeing the Scheme Fees for 2024.

9. Exemptions from the Green Gas Levy (GGL): approved biomethane certification schemes - GOV.UK (www.gov.uk)

The Oversight Panel is chaired by Sue Ellwood who also sits on the REAL company board (Linkedin profile here). She has a wealth of experience in the gas industry and a keen eye for compliance.

Monitoring compliance

The Scheme reappointed Aardvark Certification Ltd to conduct an external audit of our activities between October 2022 and September 2023.

As with previous audits it was confirmed that we have robust processes in place to issue, transfer, and retire RGGOs and that the GGCS has operated according to its Scheme Rules and contractual obligations with its members. The audit report is available to members on request.

The annual external audit is complemented by quarterly internal audits which assess the full spectrum of the Scheme's activities. These audits ensure that the correct procedures were followed when opening any new accounts and during the issuing of RGGOs, through to the monitoring of domestic green gas tariff obligations, and interaction with other certificate schemes such as ISCC.

Internal audits are assessed by GGCS's Compliance Committee led by an Independent Chair, Pamela Taylor (Linkedin profile here). The Committee also reviews and challenges our processes and management systems, for example:

- challenging instances where we have made corrections to RGGOs issued to ensure that the correct processes have been followed.
- continuously improving our risk register to ensure all risks have been assessed and appropriate mitigation actions are in place.

Verifying gas injection data

All biomethane producers who participate in the Scheme are required to produce independent, third-party verification of their meter readings and GHG calculations that form the basis of the RGGOs issued to them. This verification process also checks that RGGOs are correctly labelled as being for gas produced from waste, residue, or crop inputs.

This allows us to offer a high level of assurance to the market that RGGOs accurately represent the amount and nature of biomethane that is injected into the grid.

Maintaining a secure database

Each producer and trader has a secure account within the GGCS database where RGGOs are transferred and retired. Internal and external audits check that RGGOs retired can be tracked back to RGGOs issued without any duplication. The security features of the database are described here – www.greengas.org.uk/scheme/security.

During 2023 we ran a tender to secure a new IT provider for the Registration Database, which resulted in Grexel being appointed. Work is underway to configure this new database and migrate the system during 2024. Further details of the new database are available on request.

Policy activity

The GGCS engages with policy makers around the current and future potential of green gas and the role that tracking those gases from production to consumption can play in the efficient delivery of policy aims. Policy workstreams and achievements in 2023 included:

- Continued engagement with government on a range of policy issues including the UK Emissions Trading Scheme (UK ETS), where the Government's latest response document on the development of the scheme stated that they "...will explore the interactions between biomethane and the UK ETS and expect to set out further details..." in 2024.

- Continued attendance and contribution to discussions around the GHG Protocol (GHGP) Carbon Removals and Land Sector Initiative Draft guidance. In August 2023 we were pleased to see the GHGP publish an Interim Update on Accounting for Biomethane Certificates, which helped provide clarity on the changes made by the GHGP since 2020 in relation to their treatment of RGGOs. In addition, GGCS also responded early on in the year to a series of consultation papers issued by the GHGP which undertook a wholesale review of their four Corporate Standards for emissions reporting. In terms of biomethane and RGGOs, the most important of these consultation papers was consideration of their approach to 'market-based accounting'. This Corporate Standard review process is expected to continue into 2026.

- Monitoring developments in green tariffs. In July 2023 the Government published a 'summary of responses' document to their 2021 call for evidence on 'Designing a framework for transparency of carbon content in energy products'. The GGCS had previously sent through a detailed submission to this consultation and were pleased to see that most respondents argued that 'green gas' should be included in the tariff regulatory framework, with reasons cited that this would aid transparency and build the consumer confidence required to stimulate the market for 'green gas'.

- A significant contribution to a joint response with the REA to the Government consultation around the design elements of introducing a UK Low Carbon Hydrogen Certification Scheme. The GGCS provided detailed comments around the fundamental design of the scheme, what information should be contained on a certificate, the preferred approach to chain of custody and also the delivery and administration of the scheme. In October 2023 the Government announced their commitment to launch a scheme from 2025.

- Continuing to support the REA on a range of policy issues around biogas, biomethane, and hydrogen.

Meet the team

GGCS team members have a broad range of experience from across the renewables sector and provide Scheme Participants with an efficient and proactive service. The team members work hard across a range of policy areas to develop consumer and government recognition for green gas.

Jesse Scharf
Scheme Director

7 Years with GGCS

Jesse is responsible for the day-to-day operation of the Scheme, and for developing new business areas such as piloting the use of Hydrogen GoOs and engaging with stakeholders in industry and government.

He is the President of the board of the European Renewable Gas Registry (ERGaR), ensuring that the GGCS maintains close connections with our partners around Europe.

Syed Ahmed OBE
Policy Advisor

9 Years with GGCS

Syed is a longstanding member of the GGCS team, providing invaluable advice on a range of policy topics that impact the green gas market.

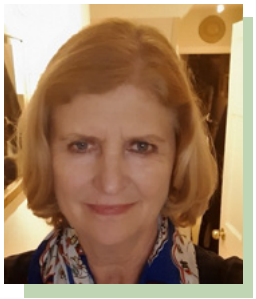
He has a breadth of experience across the energy industry, including as a member of SGN's Independent Stakeholder Group (ISG) through the passage of RIIO-GD2 and GD3.

Boris Eremin
Membership and Compliance Officer

5 Years with GGCS

Boris is an integral part of the GGCS team and well-known to our producer members, supporting them to efficiently register their gas injections, and be issued with RGGOs.

Alongside that work he ensures that producers complete and submit the appropriate audits and that our quarterly internal audit is conducted to the highest standard.



Virginia Graham OBE
Renewable Energy Assurance Ltd - Chief Executive

14 Years with GGCS

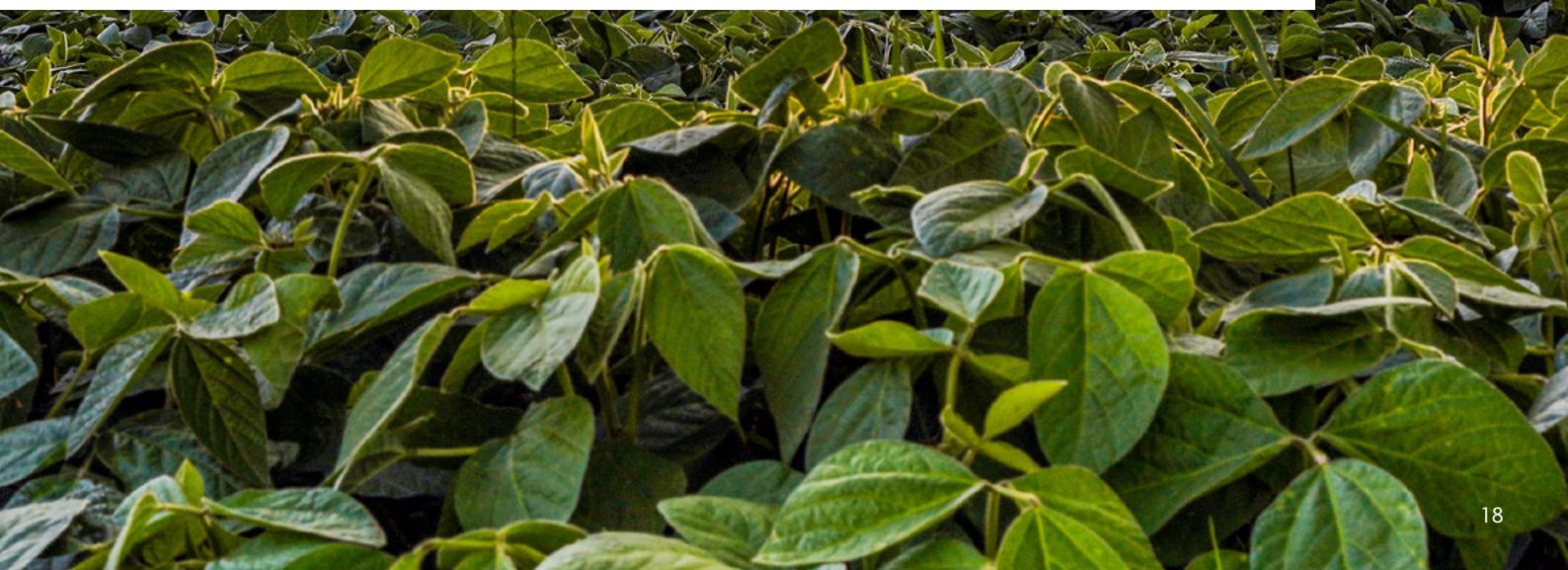
Virginia was part of the team that set up GGCS in 2011 and continues to provide her expertise and experience in developing new projects and shaping the direction of the Scheme.

A word from a GGCS member...

"Inspired has been independently verified by Cornwall Insight as the UK's number one Industrial & Commercial Third Party Intermediary for the previous five years, and the GGCS provides first rate support for our clients to meet their sustainability goals within the UK and through the links it's built across Europe.

GGCS provide first rate customer service and their ongoing support around existing and upcoming regulation, policy and new technologies is second to none. They have created a community across the spectrum, from consumers to producers, that is facilitating the market growth needed to meet our future Net Zero goals."

INSPIRED ENERGY



In 2019 REAL achieved certification of its Quality Management System to the ISO 9001:2015 standard.

The ISO 9001:2015 standard is based on a number of quality management principles including a strong customer focus, the motivation and implication of top management, the process approach and continual improvement. Using ISO 9001 helps ensure that customers get consistent, good-quality products and services, which in turn brings many business benefits.

The seven quality management principles are:

- customer focus
- leadership
- engagement of people
- process approach
- improvement
- evidence-based decision making
- relationship management.

For further information including membership lists of producers and traders active on the GGCS please visit: **www.greengas.org.uk**

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GreenGas CERTIFICATION SCHEME

REAL RENEWABLE ENERGY ASSURANCE LIMITED