**Introduction**

Enhanced EU climate ambitions require that the carbon footprint of products needs to decrease. Usage of renewable electricity by industry, households and transport is an important means to reach this.

There are two hurdles that need to be overcome:

1. Credible **accounting** is needed for claiming the renewability. Accounting of renewables needs to be credible and needs to avoid any double counting or green washing.
2. Renewable electricity is not always available at the same **location** as it is used. On the contrary, most renewables are produced at sea or at locations that are far away from industrial consumers.

Guarantees of Origin (GO) is an instrument that tackles both hurdles. It provides an accounting system and decouples the footprint (GO) from the electrons. Guarantees of origin are traded independently of the electricity and independently of any physical connections between consumption and power production.

Guarantees of Origin (GO) instrument is in almost all European countries the means of certifying unequivocally that consumed power is produced carbon neutral.

In the context of the Fit-for-55 package, including the revision of the Renewable Energy Sources directive, we advocate for a common stated objective that the future system of Guarantees of Origin must not block the path developing a European forward-looking and low-carbon based energy-intensive industry, hence:
A good GO system should be a transparent/robust, and cost-effective accounting system that enables usage of renewable electricity irrespective of location of production or consumption.

Therefor we stand for the following:

1. **Robust European GO specification**
   Need for **robust accounting specification**, designed, and implemented to avoid ‘greenwashing’ or double counting, covering:
   a. Owned energy generation assets (Scope 1)
   b. On-site or direct-connected electricity generation
   c. Grid-delivered energy consumption in separate operations (Scope 2)

   The accounting specifications should be market-based. Consumers should have a clear choice of either purchasing GOs that unequivocally certify that consumed electricity is of a renewable production source, or, as an alternative, contract electricity that is produced in a specific production facility, for instance through a Power Purchase Agreement (PPA). With a PPA, not only the electrons but also the accompanying GOs are contracted.

2. **Standardized GO handling by independent Issuing Bodies**
   Need for a **standardised GO accounting system at independent Issuing Bodies**. The route by which GOs are issued (renewable production) and cancelled (renewable consumption) varies by MS. GOs handling needs to be possible by any Issuing Bodies that ensures standardized GO accounting for renewable electricity. Additionally, consumers should have the choice to either give their supplier a mandate to arrange this for him (suppliers account), or to open an account on his own (consumers account).

3. **Location independent**
   GO enable the usage of renewable electricity **independently of any physical connections** between consumption and power production. Physical connection between production and consumption is irrelevant as long as GO specification/handling are transparent and robust.

*The views expressed in this position do not represent those of the Federation of Norwegian Industries, advocating instead for a location-based approach.*