

CONSULTATION RESPONSE



Energy Traders Europe Response to the Greenhouse Gas Protocol consultation on Actions and Market Instruments White Paper

Brussels, June 2026

Response

Energy Traders Europe welcomes the publication of the AMI Phase 1 White Paper and the opportunity to provide feedback. Our response reflects our consistent positions on European electricity market design, the role of Guarantees of Origin, and the integrity of market-based accounting.

On the proposed status of the market-based GHG inventory

We are concerned by the framing that positions the market-based GHG inventory as *complementary* to the physical inventory rather than as an equal method. This represents a significant step back from the current Scope 2 dual-reporting framework and risks downgrading the role of contractual instruments, including GOs and PPAs, in corporate GHG accounting.

The market-based method exists precisely because the physical inventory cannot capture the procurement decisions that drive decarbonisation. Relegating it to a complementary role would undermine the commercial rationale for PPAs, reduce corporate demand for GOs and long-term renewable contracts, and contradict the European policy framework that has built a functioning, harmonised market for Guarantees of Origin. The market-based inventory must retain equal status to the physical inventory in the AMI framework.

On market-based reporting and double claiming

Under the current framework, companies may report electricity consumption using a renewable grid mix under the location-based method even when the associated renewable generation has already been claimed through retired energy attribute certificates. As long as both methods hold equal status, the risk of double reporting remains structurally embedded in the system, undermining trust in green electricity reporting.

To alleviate this problem, we recommend that the GHG Protocol give a clear hierarchical advantage to market-based claims and restrict the location-based method where GoOs have already been retired. Applying a fossil-based emission factor where no valid contractual

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instrument or residual mix is available is an essential safeguard to prevent double-claiming and maintain the integrity of the framework. This ensures that only properly issued and tracked contractual instruments, such as Guarantees of Origin, can be used to make renewable consumption claims.

Positioning the market-based inventory as merely complementary to the physical inventory makes this problem structurally worse, not better. The AMI framework must resolve the double claiming risk by establishing a clear hierarchy between the two methods.

On eligibility criteria and deliverability

We strongly oppose any reintroduction of deliverability or locational matching requirements through AMI eligibility criteria. The European power system is built on harmonised market coupling, where physical traceability of electrons is neither feasible nor meaningful. Eligibility criteria must not be conditioned on bidding-zone boundaries. Phase 2 must not use quality criteria development as a vehicle for imposing mandatory hourly or locational matching requirements that the GHG Protocol Standards Board chose not to progress in the Scope 2 process.

On contract integrity

Phase 2 must include an explicit grandfathering provision covering all forward contracts concluded before the new AMI requirements enter into force. Long-term contracts such as PPAs, with durations of 3 to 15 years, require both counterparties to take on significant risk and make substantial financial commitments. Retroactive application of new requirements to contracts signed in good faith would undermine market confidence, increase risk premiums, and damage the functioning of long-term renewable procurement markets.

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