



TRACEABILITY & CHAIN OF CUSTODY

CERTIFHY EU RFNBO VOLUNTARY SCHEME

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1. Status of this document

This document, 'Traceability & Chain of Custody', is part of the CertifHy EU RFNBO Voluntary Scheme.

All CertifHy EU RFNBO Voluntary Scheme documents in their latest applicable version are valid and must be considered for the scope of application. In the event of conflict between the text of this document and the CertifHy EU RFNBO Voluntary Scheme "Scheme Document", the "Scheme Document" shall always take precedence.

1.1 Change History

Version	Date	Description
1.0	28.02.2023	Version 1.0
1.1	10.07.2023	Version 1.1: - Adjustments following the publication of an updated version of the Assessment Protocol for Voluntary Schemes for RFNBOs)
1.2	15.01.2024	Version 1.2: - Adjustments taking up the Q&A Document of the European Commission of 26.07.2023)
1.3	02.05.2024	Version 1.3: - Adjustments taking up the Q&A Document of the European Commission of 14.03.2024 and feedback from DG ENER)
1.4	25.07.2024	Version 1.4: - Precisions on the use of the Union Database: mandatory checks, technical guidance; - Gaps between consecutive mass balance periods shall not occur; - Use of interconnected infrastructures; - Adjustment on data retention (five years, unless otherwise required by national law)



1.5	31.10.2024	Version 1.5: - Update to RED reference and editorial adjustments - Updates regarding the Union Database
1.6	22.10.2025	Version 1.6: - Scope of certification - Update of figure 1 on relevant supply chain elements for calculation - Quality Management System (QMS) requirement added - Specification on measurement systems added - Editorial adjustments



2. Purpose of this document

The purpose of this document is to ensure that Economic Operators certified under the CertifHy EU RFNBO Voluntary Scheme put in place a robust and transparent chain of custody system.

This document gives guidance on how Renewable Fuels of Non-Biological Origin (RFNBOs) certified under the CertifHy EU RFNBO Voluntary Scheme shall be traced, from the origin of the inputs to the final user, each time it passes through an internal processing step or changes ownership (i.e. custody) along the supply chain (or “chain of custody”). A supply chain includes each stage of processing, conversion, transformation, trading and distribution where progress to the next stage involves a change of legal and/or physical control. Supply chains can begin at the stage of electricity production.



3. Scope and Normative References

The requirements described in this document apply to all elements of the supply chain of products and raw materials.

The legal basis for the provisions laid down in this document consists of:

- the Revised Directive EU/2018/2001¹;
- Commission Implementing Regulation (EU) 2022/996 of 14 June 2022 on rules to verify sustainability and greenhouse gas emissions saving criteria and low indirect land-use change-risk criteria;
- the Commission Delegated Regulation 2023/1185 of 10.02.2023 supplementing Revised Directive EU/2018/2001 of the European Parliament and of the Council by establishing a minimum threshold for greenhouse gas emissions savings of recycled carbon fuels and by specifying a methodology for assessing greenhouse gas emissions savings from renewable fuels of non-biological origin and from recycled carbon fuels;
- the Annex to the aforementioned Commission Delegated Regulation; and
- the Commission Delegated Regulation 2023/1184 of 10.02.2023 supplementing Revised Directive EU/2018/2001 of the European Parliament and of the Council by setting out detailed rules for the production of renewable fuels of non-biological origin.

¹ Revised Directive EU/2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast); OJ L 328, 21.12.2018, p. 82 and Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652



4. Traceability requirements

4.1 General requirements

Traceability describes the ability to identify and trace the origin, processing history, distribution and location of products and materials through supply chains. It includes the requirement to be able to physically trace products and materials through supply chains, but also to be able to determine what products are made of and how they have been processed. "Traceability" thus represents a core element of a reliable certification scheme such as the CertifHy EU RFNBO Voluntary Scheme.

"Chain of custody" is a general term for the process of transferring, monitoring and controlling inputs and outputs and related specific information as they move through the supply chain. This provides credibility that a given consignment of product is associated with a specific set of characteristics (e.g. sustainability and GHG savings attributes) and that the information regarding the specific characteristics linked to the product is transferred, monitored and controlled throughout the supply chain.

The Economic Operator shall put in place a chain of custody system that meets all requirements laid out in this document.

The chain of custody system of the Economic Operator must trace certified products through the processes included in the scope of certification based on the mass balance method. Other methods are not permitted.

The following elements of the supply chain are subject to certification under the CertifHy EU RFNBO Voluntary Scheme: RFNBO producers, processing units, traders with or without storage; in other words, any owner of the RFNBO at any stage of the full supply chain, excluding the final consumer.



First processing unit (Hydrogen production or integrated RFNBO production)	Further processing units or trader	Final processing unit or trader
Processing emissions	Processing emissions or trader emissions	Processing emissions or trader emissions
Upstream emissions (e_{up}) (electricity, CO ₂ , water, etc.) incl. Transport	Upstream emissions (e_{up}) incl. Transport	Upstream emissions (e_{up}), incl. Transport Downstream emissions (e_{down}) incl. Transport, where the final processing unit or trader delivers to the final consumer

Figure 1: Relevant supply chain elements for calculation

The scope of certification for fuel producers may differ based on their organizational structure, but typically, each fuel producer requires only one certification. A distinction must be made between producers involved in a single activity (such as electrolysis) and those operating compound systems that integrate multiple processes (e.g., electrolysis, CO₂ sourcing, and fuel synthesis at a single site).

For such compound systems, a further distinction must be made between operations managed by a single legal entity and those involving multiple separate legal entities. If the installations are operated by different legal entities, each must be certified individually based on the specific activity it performs. Conversely, if all installations fall under a single legal entity, the compound system may be certified as a whole.

Nevertheless, in such cases, the fuel producer must implement a mass balance system for each installation that aligns with the requirements outlined in this document regarding the principles for Mass Balancing. Additionally, greenhouse gas emissions must be calculated separately for each installation, following the methodology detailed in the CertifHy Scheme Document “GHG EMISSIONS & SUSTAINABILITY”. Proof of compliance must also be provided for each installation.

Once the certification body makes a positive decision, a certificate will be issued. This certificate serves as evidence of compliance with the scheme and defines the scope of certification — whether for a specific activity or for the entire compound system.

All traders of sustainable products must also be covered under CertifHy EU RFNBO certification. Traders buy and sell sustainable products. Traders that use their own or rented storage facilities are certified under the scope ‘trader



with storage’. So-called paper traders, i.e. traders without physical contact with the sustainable product (i.e. no use of own or rented storage facilities) must be certified under the scope ‘trader’.

When the processing of a consignment yields more than one output that is intended for the production of RFNBOs, a separate emission factor shall be applied and a separate mass balance shall be used for each output.

A valid certificate provides evidence that the certified element complies with the criteria of Revised Directive EU/2018/2001 and the CertifHy EU RFNBO Voluntary Scheme.

Economic Operators that are not certified cannot issue Proofs of Sustainability according to this scheme.

4.2 Proof of sustainability

Sustainability includes the renewability and GHG emissions characteristics set forth in the CertifHy EU RFNBO Voluntary Scheme document “GHG Emissions & Sustainability”.

Evidence of the sustainability characteristics of an RFNBO is documented and forwarded through the supply chain by using a “Proof of Sustainability”, which is always linked to a specific product consignment. A Proof of Sustainability is a delivery document containing relevant information about the RFNBOs that must be issued by the supplier for each delivery of RFNBO volumes.

Where a consignment of fuel is used to comply with an obligation placed on a fuel supplier by an EU Member State, it shall be considered withdrawn from the mixture of the mass balance.

A Proof of Sustainability must contain the information stated in this document. However, no provisions are made regarding the form or layout of the Proof of Sustainability.

4.3 Requirements for the Management System

The management system describes the scope of responsibilities and internal company processes and procedures needed to ensure that an Economic Operator is able to implement and update all the requirements for achieving the objectives of this scheme.

Any Audit for verifying compliance with the requirements of this scheme is related to a legal entity at a specific site (defined as being a geographical location with precise boundaries). If Economic Operators outsource or delegate tasks that are related to sustainability, traceability or chain of custody requirements to service providers (e.g. transport, storage, processing of RFNBOs, etc.) they must ensure that the service providers also comply with the



CertifHy EU RFNBO Voluntary Scheme requirements. This includes contractual agreements and the exchange of relevant information and documentation between the certified Economic Operator and the service providers.

The management system must be adequate with respect to the nature, scope and quality of the required activities. Risk management factors must also be considered when designing the management system (see “Risk Management” document).

The Economic Operator shall establish, implement and maintain a Quality Management System (QMS) that covers the CertifHy RFNBO requirements for sustainability, GHG emissions, traceability and chain of custody. The QMS shall include documented procedures for document and record control, competence and training, internal audits, management review, and corrective/preventive actions. The QMS shall be adequate for the scope and complexity of the operations.

The management system must ensure that good management practices with respect to sustainability, greenhouse gas emissions, traceability and chain of custody requirements are applied at every critical control point. All elements of the supply chain must ensure that their management systems cover these requirements.

The management team of the Economic Operator must commit itself, in writing, to compliance with the CertifHy EU RFNBO Voluntary Scheme requirements. This commitment must be made available to the employees, suppliers, customers and other interested parties.

The Economic Operator shall appoint a management representative, who shall have the overall responsibility and authority to put in place and monitor the chain of custody system.

Furthermore, the Economic Operator must identify and nominate competent employees at critical control points. Their tasks include the implementation and maintenance of processes and documentation to ensure the compliance of the company with all relevant requirements of the CertifHy EU RFNBO Voluntary Scheme.

In this respect, the Economic Operator shall provide involved employees with the appropriate training and ensure that they have the required competences (see also section Status of this document 4.5 “Qualification and Training of Employees”).

The Economic Operator shall have all necessary infrastructure (e.g. software or other tools) and operating procedures in place to effectively operate the chain of custody system and ensure that all certified products can be traced continuously and without interruption through all processing and trading steps taking place within the scope of certification between the acquisition of the products and their forwarding to clients. The Economic Operator must also have an auditable system for safekeeping and reviewing all evidence related to the claims they make or rely on (see also the CertifHy EU RFNBO Voluntary Scheme document “Logos, Labels & Claims” document). All measurement systems used for metering inputs, outputs and electricity shall be available, fully functional and calibrated in



accordance with applicable standards/matrix specifications. Calibration certificates and maintenance logs shall be retained and made available to the auditor.

4.4 Documentation and Information requirements

CertifHy will allow for the certification of Economic Operators on the conditions that they:

- a) have a documentation management system;
- b) have an auditable system for safekeeping and reviewing all evidence related to the claims they make or rely on;
- c) keep all evidence necessary to comply with the Implementing Regulation 2022/996 and Revised Directive EU/2018/2001 for a minimum of five (5) years, or longer where it is required by the relevant national authority; and
- d) accept responsibility for preparing any information related to the auditing of such evidence.

The internal company procedures related to the requirements of this scheme must be documented in writing. This documentation must contain at least the following elements:

- Description of the company's internal product flows;
- Organisational structure, responsibilities and authorities with respect to sustainability, GHG and chain of custody requirements; and
- Procedures related to the control of traceability and chain of custody regarding all requirements of this scheme.
- Quality Management System documentation (e.g., quality manual, mapped procedures and responsibilities, document/record control, internal audit program, management review minutes, CAPA records).

The Economic Operator shall put in place a chain of custody system to trace all certified products through the processes included in the scope of certification.

Economic Operators must keep the following records for all inputs and outputs:

Producer:

- List of all suppliers of certified products and electricity, their valid certificates and contracts with subcontractors and service providers related to certified products and electricity (e.g. Power Purchase Agreement)
- purchase documents, including e.g. purchase orders, contracts, invoices and goods receipts, delivery notes and received quantities



- records of inputs and outputs
- sales orders, sales invoices, dispatch information (including dates), customers to which the consignment or lot was dispatched and delivery records
- stock records, including inventory balancing
- records regarding the transfer of data to and from any database(s) used
- transporter or shipper contact details
- records of the mass balance calculation
- list of all recipients of certified products, including their address and contracts
- additional sites used by the operator but owned by third parties; and
- records of other certification schemes with comparable scopes used, non-conformities with these schemes and related corrective actions and, if applicable, information on withdrawn or suspended certificates.
- Calibration certificates and maintenance records for meters/measurement systems used for quantity bookkeeping and mass balance.

Storage units:

- Records of certified inputs and outputs
- list of all suppliers of certified products and electricity, including a copy of their valid certificates
- purchase documents, including e.g. purchase orders, contracts, invoices and goods receipts, delivery notes and received quantities
- sales orders, sales invoices, dispatch information (including dates), customers to which the consignment or lot was dispatched and delivery records
- stock records, including inventory balancing
- transporter or shipper contact details
- record of mass balance calculation
- records regarding the transfer of data to and from any database(s) used; and
- if the Economic Operator is not the legal owner of the storage site, a written contract between the operator and the legal owner of the site will be required to forward products with a CertifHy EU RFNBO Voluntary Scheme compliance claim included with the product information.
- Calibration certificates and maintenance records for meters/measurement systems used for quantity bookkeeping and mass balance.

All Economic Operators must operate a periodic reporting system of maximum three (3) months regarding the input quantities and storage levels at the beginning and end of the period, and the output quantities of RFNBOs supporting the mass balancing. Companies are obliged to inform their Certification Body immediately if any discrepancies occur in the documentation.



All companies handling and supplying RFNBOs to other companies are obliged to provide their recipients with all necessary documents and sustainability and GHG information in the scope of this scheme. Furthermore, companies must keep all relevant records and documents (as hard copies and/or electronically) for at least five (5) years, or longer if required by the relevant national authority. Documents and information are to be treated as confidential and must not be made accessible to unauthorised third parties.

Records and documentation regarding traceability, quantity bookkeeping, mass balance and GHG emissions must be up to date and must be fully accessible to the Certification Body and Auditor during the Audit process. If, at the time of the Audit, a company is also certified under other sustainability certification schemes with comparable scopes, or has been certified in the twelve months prior to the Audit, information on the other certifications must be provided to the Auditor, including the name of the other scheme(s) and the certification scope(s).

Furthermore, all records regarding the quantity bookkeeping and mass balance calculations for other certification schemes used must be made available to the Auditor. This is important to verify that no double- or multiple-counting has taken or place.

If a company uses traceability databases, all records of input and output data transfers must be made available to the Auditor. These records must also be inputted into the Union Database. The Economic Operator, or, where applicable, the CertifHy Scheme Operator, shall correctly enter in a timely manner all relevant information into the Union Database on the transactions made and on the sustainability characteristics of the fuels subject to those transactions, including their lifecycle greenhouse gas emissions, starting from their point of production to the moment they are placed on the market in the Union, to ensure the transparency and traceability of the product.

Auditors must verify that the entries made by the certified Economic Operator into the Union Database correspond to the figures that are part of the Economic Operator's bookkeeping, net mass balance data or other encoded information about their entities or sites. The Auditor must check:

- (1) the existence of a Company Identifier belonging to the Economic Operator;
- (2) that the Economic Operator is able to input the necessary data into the Union Database (either via a third party Service Provider or any other Access Point between the data and the Union Database); and
- (3) that the volumes of issued Proofs of Sustainability and the volumes of sustainable products transacted (bought and/or sold) are consistent with the volumes of products and the transacted volumes reported in the Union Database.

Where appropriate, the CertifHy Scheme Operator may request Economic Operators to use specific database solutions, if they comply with the data protection and other relevant requirements laid out in Revised Directive EU/2018/2001.



Certification Bodies are required to verify the accuracy and completeness of information entered by Economic Operators into the Union Database or relevant national database. Any deviations between data that has been registered in the Union Database and the respective data from the Economic Operator's documentation shall be immediately flagged in the Audit report and to the CertifHy Scheme Operator. Such discrepancies can lead to major non-conformities identified in the Audit report and may trigger a suspension of the certificate of the Economic Operator.

Data to be transmitted through the whole supply chain includes:

- a) Name of the voluntary or national scheme
- b) Proof of Sustainability number
- c) Sustainability and GHG emission savings characteristics, including:
 - i. statement on whether the fuel complies with the criteria set out in Articles 27 and Art. 28 of Revised Directive EU/2018/2001 as well as the related Delegated Regulations
 - ii. GHG emission data calculated according to the methodology set out in Delegated Regulation related to Revised Directive EU/2018/2001 Art. 28(5) and its Annex; and
 - iii. description of when the installation started operation
- d) Name of input material(s) that the fuel or intermediate product is produced from
- e) Fuel type
- f) Country of origin of the electricity used for hydrogen production
- g) Country of fuel production; and
- h) Information on whether support has been provided for the production of that consignment, and if so, the type of support scheme.

Transaction data to be included:

- a) Supplier company name and address
- b) Buyer company name and address
- c) Date of (physical) loading
- d) Place of (physical) loading or logistical facility or distribution infrastructure entry point
- e) Place of (physical) delivery or logistical facility or distribution infrastructure exit point; and
- f) Volume: For fuels, the energy quantity of the fuel must also be included. To calculate the energy quantity, conversion factors in Annex III of Revised Directive EU/2018/2001 must be used. To determine the energy content of transport fuels not included in Annex III, the relevant European Standards Organisation (ESO) standards shall be used to determine their calorific values. Where no ESO standard has been adopted for that purpose, the relevant International Organization for Standardization (ISO) standards shall be used.

Auditors must verify that the information entered into the database is consistent with the audited data.



The Economic Operator shall keep these records for a minimum of five (5) years, or longer where required by the relevant national authority.

4.5 Qualification and Training of Employees

The Economic Operator must ensure that all members of staff responsible for and working on the implementation and maintenance of the sustainability, GHG, traceability and chain of custody requirements are competent and have the necessary training, education, skills and experience.

The Economic Operator must establish and implement a training plan regarding the critical control points and covering the position(s) involved in its chain of custody system.

The Economic Operator must keep records of the trainings provided to its staff as pertain to this scheme.



5. Requirements for the Chain of Custody

5.1 Mass Balancing

According to Revised Directive EU/2018/2001, Economic Operators shall provide evidence that the sustainability and GHG savings criteria of Revised Directive EU/2018/2001 have been fulfilled. The traceability and evidence of the sustainability characteristics of products are achieved by applying the traceability measures described in Chapter 4 of this document and the mass balance method. This ensures that all sustainability characteristics remain assigned to the appropriate consignments of RFNBOs and raw materials, and that the amount of RFNBOs, other fuels and materials withdrawn at any stage of the supply chain does not exceed the amount supplied.

According to Art. 30(1) of Revised Directive EU/2018/2001, Economic Operators shall use a mass balance system that allows the physical mixing of fuels and materials with different sustainability and GHG emissions saving characteristics and non-renewable fuels and materials. The information about the sustainability characteristics and size of consignments with differing sustainability and GHG emissions saving characteristics must remain assigned to the mixture. The mass balance system also allows for consignments with differing energy content to be mixed for the purpose of further processing, given that the size of the consignments is adjusted according to their energy content. The exact amounts and sustainability characteristics of RFNBOs that leave any element along the supply chain must be documented and shall never exceed the amount of RFNBOs, fuels and materials that entered the respective element.

Economic Operators shall apply the following rules when implementing the mass balance system:

- a) Raw material or fuels shall only be considered part of a mixture if they are mixed in a container, at a processing or logistical facility, or at a transmission and distribution infrastructure or site
- b) Fuels introduced into a logistical facility or a transmission or distribution infrastructure, such as the gas grid or a pipeline network for liquid fuels, and stored in facilities shall only be considered part of a mixture pursuant to point (c) where that infrastructure is interconnected
- c) Economic Operators shall be required to keep separate mass balances for raw materials and fuels which cannot be considered part of a mixture. The transfer of information about the sustainability and GHG emissions saving characteristics and sizes between different mass balances shall not be allowed. Pursuant to subparagraphs (a) to (c), raw materials inside biofuel, bioliquid or biomass fuel production facilities are considered part of a mixture. Therefore, the requirement to keep separate mass balances shall not apply to such facilities, and a single mass balance can be kept

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- d) The mass balance system shall include information about the sustainability and GHG emissions characteristics and quantities of raw material and fuels, including information about the quantities of raw material and fuels for which no sustainability or GHG characteristics have been determined
 - e) Where a consignment of raw material or fuel is delivered to an economic operator that is not participating in a voluntary scheme or national scheme, the delivery shall be reflected in the mass balance by withdrawing an equivalent quantity of raw material or fuel. The type of fuel to be booked out shall correspond to the physical nature of the raw material or fuel delivered
 - f) Where a consignment of fuel is used to comply with an obligation placed on a fuel supplier by a Member State, it shall be considered withdrawn from the mixture of the mass balance
 - g) The sustainability and GHG emissions saving characteristics of a consignment of raw material or fuel shall be considered a set. Where consignments are withdrawn from a mixture, any sets of sustainability characteristics may be assigned to them, provided that the sets of sustainability and GHG emissions saving characteristics are not split and the mass balance is achieved over the appropriate period of time; and
 - h) Where relevant for transparency reasons, the mass balance system shall include information on whether support has been provided for the production of the fuel or fuel precursor, and if so, the type of support.

According to Art. 30(2) of Revised Directive EU/2018/2001, where a consignment is processed, information on the sustainability and GHG emissions saving characteristics of the consignment shall be adjusted and assigned to the output in accordance with the following rules:

- a) When the processing of a consignment of raw material yields only one output that is intended for the production of biofuels, bioliquids or biomass fuels, renewable fuels of non-biological origin or recycled carbon fuels, the size of the consignment and its related quantities of sustainability and GHG emissions saving characteristics shall be adjusted by applying a conversion factor that represents the ratio between the mass of the output that is intended for such production and the mass of the raw material entering the process; and
- b) When the processing of a consignment of raw material yields more than one output that is intended for the production of biofuels, bioliquids or biomass fuels, renewable fuels of non-biological origin or recycled carbon fuels, a separate conversion factor shall be applied and a separate mass balance shall be used for each output.

When consignments with different sustainability characteristics are physically mixed, the respective sizes and sustainability characteristics of each consignment must remain assigned to the consignments in the quantity bookkeeping. If products are processed or losses are incurred due to internal company processes, the appropriate conversion factors shall be applied to adjust the sizes of the consignments accordingly.



When transferring GHG characteristics from renewable gases to RFNBOs, the GHG emissions from gas compression shall be taken into account, along with the relevant conversion factors.

If a mixture is separated, a set of sustainability characteristics can be assigned to any consignment that is taken out. The sum of all consignments withdrawn from the mixture must have the same sustainability characteristics, in equal quantities, as the sum of all consignments added to the mixture.

The certified party must split the quantity bookkeeping for all products with different sets of sustainability characteristics.

Within the quantity bookkeeping, consignments of input products can be merged if they have the same sustainability characteristics. Consignments of inputs cannot be merged within the bookkeeping if they have different sustainability characteristics, or none at all.

The input (injection) and output (withdrawal) of gas in interconnected infrastructure must be documented by the Economic Operators and is subject to independent auditing. Deficits in the mass balance system must not occur at the end of the mass balancing period.

The sustainability characteristics of a specific amount of RFNBO can only be used once and for one application (e.g. as renewable fuel under Revised Directive EU/2018/2001). Double-counting is not allowed and represents a serious violation of the CertifHy EU RFNBO Voluntary Scheme requirements. The double-counting of individual sustainability characteristics, such as the GHG emissions savings, is also prohibited. To minimise the risk of double-counting, an eligible and high-level member of staff of the Economic Operator issuing the Proof of Sustainability must sign a statement/declaration confirming his or her awareness that double-counting is not allowed. Economic Operators must declare the names of all schemes they participate in and must provide the Auditor with all relevant information and documentation related to the other schemes used.

Sustainability characteristics can only be assigned to consignments of gas that have been registered in the Union Database.

The mass balance of the interconnected infrastructure carrying the gas must be entirely covered by the Union Database. Where liquid or gaseous fuels are introduced into an interconnected infrastructure and are subject to the same mass balancing system, the respective sustainability and GHG emissions saving characteristics shall be assigned to the consignments entering and exiting the interconnected infrastructure. For the purpose of entering data into the Union Database, the interconnected gas system shall be considered a single mass balance system. Data on the injection and withdrawal of renewable gaseous fuels shall be provided to the Union Database. Data on whether support has been provided for the production of a specific consignment of fuel, and if so, information regarding the type of support scheme, shall also be entered into the Union Database.



Each Economic Operator must operate an information system capable of tracing the amounts of materials, RFNBOs and other fuels sourced and sold. This could include, inter alia, a digital database, documentation with unique reference numbers for consignments or similar.

If a Member State decides to complement a mass balance system by a system of guarantees of origin, Economic Operators must enter into the Union Database data on the transactions made, the sustainability characteristics and other relevant data, such as the GHG emissions of the fuels up to their point of injection into the interconnected gas infrastructure.

The quantity bookkeeping and physical mixture of RFNBOs is limited to certain periodical and spatial boundaries. Periodical boundaries define the timeframe during which the input and output of products with specific sustainability characteristics must be balanced. The maximum balancing timeframe (period) according to Revised Directive EU/2018/2001 is three (3) months. Participants of the CertifHy EU RFNBO Voluntary Scheme may choose a period less than three (3) months, for example, a one (1) month period is possible. Gaps between consecutive mass balance periods shall not occur. At the end of the mass balance period, the sustainability data carried forward should be equivalent to the physical stock in the container, processing or logistical facility, transmission and distribution infrastructure or site.

Spatial boundaries define the location (spatial entity) in which the chain of custody requirements must be applied. The mass balance system must at least be site-specific. This means that the mass balance system must refer to one geographical location with precise boundaries (site of operation). A mass balance system can also be operated for transmission and distribution infrastructure (e.g. hydrogen grid). If more than one legal entity operates at one location, then each legal entity is required to operate its own quantity bookkeeping. Isolated grids, or parts that are not physically connected, cannot be considered part of the same mass balance system.

The Economic Operator shall monitor the balance of products certified according to the CertifHy EU RFNBO Voluntary Scheme that are withdrawn from and added to the mass balance system. The Economic Operator shall use a method that allows the calculation of the mass balance at every point in time. Deficits in the physical stock shall not occur at the end of the mass balancing period. In other words, the Economic Operator shall not forward or deliver greater amounts of products certified according to the CertifHy EU RFNBO Voluntary Scheme than were acquired or produced.

The Economic Operator may carry forward a positive balance of products certified according to the CertifHy EU RFNBO Voluntary Scheme into the next reporting period if the corresponding amount of products certified according to the CertifHy EU RFNBO Voluntary Scheme is in stock and until the positive balance is expended.

If several operational sites are included in the scope of certification, each operational site shall maintain its own mass balance accounting system. The mass balance system shall operate at a level at which consignments could normally be in contact, such as in a container, processing or logistical facility, transmission and distribution



infrastructure or site (defined as a geographical location with precise boundaries within which products can be mixed).

5.2 Requirements for Mass Balance Audits

The verification of mass balances is an integral part of the Audit of an Economic Operator. The Auditor must verify that the amount of RFNBOs and materials that have been claimed as sustainable is less than or equal to the amount that was actually available, and also that no double-counting of RFNBOs and/or other material has taken place.

Prior to the Audit, the Economic Operator must submit all mass balances to the Certification Body conducting the Audit. This includes all mass balances relevant to the certification of the Economic Operator, i.e. every site (e.g. external storage facility) covered by the certificate.

During the initial Audit, which must be carried out before the Economic Operator is allowed to participate in the scheme, the Auditor shall check the existence and functionality of the mass balance system. During subsequent annual Audits, the Auditor shall check at least the following elements:

- List of all sites that are covered under the certification. Each site shall have its own mass balance records
- List of all inputs, outputs and inventory per site, including descriptions of the products handled and information on the suppliers and recipients, respectively. This list must include both RFNBOs and non-RFNBOs, as well as their sustainable and non-sustainable inputs, and if relevant, all fossil products handled by the sites; Calculation of the GHG intensity, based on data from previous period(s)/year(s)
- Timeframe of mass balance periods. The start and end of the period shall align with the calendar year or, where applicable, the four quarters of the calendar year. As an alternative to the calendar year, Economic Operators may also use the fiscal year they use for bookkeeping purposes, provided that their choice is clearly indicated and applied consistently. The start and end date of each mass balance period should be documented transparently. The Economic Operator must inform the Certification Body of any changes to the mass balance period
- Any discrepancies between the bookkeeping system and its inputs, outputs and balances
- Verification of the mass balance calculation to ensure that the bookkeeping is balanced and/or that credits were calculated correctly
- Allocation of sustainability characteristics; and
- Mass balances and other relevant documentation of other certification schemes used by the Economic Operator must be taken into account to ensure that no double-counting has taken place.



5.3 Requirements for acquiring and handling certified products

The acquisition of all fuels, materials or electricity used for the production, processing or handling of RFNBOs shall be based on a written contractual agreement between the Economic Operator and the suppliers.

The Economic Operator shall make sure that sufficient detail to identify the products is included in the product information that is attached to every consignment of products certified according to the CertifHy EU RFNBO Voluntary Scheme and that is acquired, handled or forwarded. The Economic Operator shall keep records of this information.

The forwarding of all certified products and electricity shall be based on a contractual agreement between the Economic Operator and its customers.

The Economic Operator shall include a Proof of Sustainability with any consignment of outgoing certified product. The Proof of Sustainability shall include the following product information:

For incoming certified products:

- Description of the incoming product
- Specification of the technology that was used for production
- Country of origin
- Quantity of certified products
- Date of acquisition and, if different from the date of acquisition, the date of entry into the participating Economic Operator's chain of custody tracing and management systems
- Valid certificate number and name of the Certification Body; and
- GHG emissions intensity.

For certified products in process within the scope of certification:

- Identification and description of the process; and
- Name and address of the site(s) where the processing steps occur.

For outgoing certified products:

- Description of the product'
- Specification of the technology used to produce the product



- Statement on whether the product is eligible under the CertifHy EU RFNBO Voluntary Scheme
- Quantity of certified product(s)
- Date of shipment
- Name and address of the customer(s) and delivery site
- Name and address of the production or storage site(s) and the site from which the product is forwarded;
- If the site from which the product is forwarded is managed by an external third party, the name and address of this external third party;
- Country of origin;
- Unique number of the delivery note;
- ID number of the consignment;
- Valid CertifHy EU RFNBO Voluntary Scheme certificate number and name of the Certification Body;
- GHG emissions intensity; and
- Statement on whether the GHG value contains transport emissions. If not, list of transport type and transport distance (in km).

The Economic Operator may use regular sales documentation (e.g. invoices) instead of a Proof of Sustainability, as long as the sales documentation includes all relevant product information described above.

The Economic Operator shall keep records of all product transfer information for a period of five (5) years, or longer if required by the relevant national authority.



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