

WEBINAR (21/10/2026)

Building National Biomethane
Registries for European Integration

Focus Country: UKRAINE

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- **UA: UKRAINE**
- **Resource base:** Europe's largest agricultural land area, with up to 21.8 bcm/yr of biomethane potential (UABIO)
- **EU relevance:** Ukraine could cover up to 20% of the REPowerEU target of 35 bcm by 2030
- **Infrastructure:** an extensive gas grid, physically interconnected with Poland, Slovakia, Hungary and Romania
- **Drivers:** energy security, replacing imported gas, and EU integration
- **Sector start:** the first biomethane plant came on stream in 2023



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- **Strategy:** Biomethane Development Program to 2035, targeting >1 bcm/yr by 2030 and 2.1 bcm/yr by 2035. Phase I (2026–27) covers the regulatory framework, support mechanisms, GOs and UDB access.
- **Key regulations:**
 - ✓ Law No. 1820-IX (2021): defines biomethane, grants the right to grid injection, creates the Registry and GOs
 - ✓ CMU Res. No. 823 (2022): Procedure for the functioning of the Biomethane Registry.
 - ✓ Law No. 3613-IX (2024) and MoF Order No. 1250/42595: customs clearance of pipeline biomethane, linked to sustainability certification
- **Institutions:** Ministry of Energy and Ministry of Agrarian Policy and Food (policy), SAEE (registry and GOs), GTSOU/DSOs (injection, metering), NEURC (regulator).
- **EU alignment:** Ukraine is an Energy Community Contracting Party (RED II mandatory) and an EU candidate (RED III, 2024 Gas Package). It is not yet connected to the UDB, ERGaR or AIB.
- **Support and compliance:** No operating biomethane support scheme yet. Investment support for projects >€12m. The transport mandate is >7% bio-components in petrol since July 2026 (liquid only), with no biomethane quota. The ETS has a legal basis in the climate law, but the dedicated ETS law is still a draft.



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- **Capacity and volumes:** 6 operating plants with 108 mcm/yr capacity, all ISCC-certified. In 2025 production was ~21–22 mcm.

- **Injection:**

Connection	Plants	Total Capacity
GDS	Hals Agro, Vitagro, MHP Dnipro	17 mcm/yr
Bio-LNG	MHP Vinnytsia, YM Liquid Gas	35 mcm/yr
GTS	Teofipol Energy Company	56 mcm/yr

- **Expected:** 7 plants (+ ~ 40 mcm/yr) are planned for 2026–28, connecting to the GDS, the GTS and Bio-LNG.
- **End use and demand:** Production is almost entirely exported to the EU. Domestic demand is practically absent.



- **Status:** Operational, in trial mode since 02/2026, run by SAEE. It covers grid-injected biomethane and Bio-LNG/CNG.
- **Registry type:** Type 1 today, Type 3 (partial) from 01/2027
- ✓ GOs (1 MWh, valid 1 year) are issued, transferred, split and cancelled. On cancellation, the registry issues a Certificate of Origin to the final consumer
- ✓ GOs are issued against metered injection data reported monthly by GTSOU and DSOs
- ✓ Sustainability-linked: producers register their ISCC certificate, and a PoS is required for each volume or Bio-LNG batch
- ✓ PoS is stored as evidence only; there is no PoS transfer or mass balance in the registry

Amendments (CMU Res. No. 1242 of 07.10.2026, in force 3 months after publication, ~01/2027):

- ✓ GO issuance is decoupled from PoS: the volume basis becomes metering plus the acceptance act only
- ✓ GO transfer, cancellation and export are allowed only for volumes covered by a PoS, which must be uploaded within 10 working days of issuance
- ✓ Result: separate book-and-claim (GO) and sustainability (PoS) layers, i.e. Type 3 logic

Interaction with EU systems:

- ✓ On export, GOs are deducted from the producer's account to prevent double counting; they are not transferred abroad
- ✓ The Procedure provides for recognising GOs from EU and Energy Community registries, but only on the basis of international agreements, and none are concluded yet

Planned: UDB interface for PoS mass balancing, plus cross-border GO transfer under a recognition agreement, which would complete the transition to a full Type 3 system.



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- **Main barriers:**

- ✓ No recognition of Ukraine's grid as part of the EU interconnected system and no UDB link.
- ✓ Registry still in trial mode, with no cross-border GO transfer
- ✓ Export-driven economics: no domestic support scheme or demand (quotas, ETS)

D2.1 recommendations:

- ✓ EC recognition of Ukraine's GTS as part of the EU interconnected gas system for UDB purposes
- ✓ Non-discriminatory recognition of Ukrainian biomethane certified under EU-recognised schemes (ISCC)
- ✓ Energy Community Ministerial Council decision on mutual recognition of Ukrainian GOs
- ✓ Transitional: EU Member States accept ISCC PoS until the UDB is operational for gaseous fuels
- ✓ Domestic demand drivers: transport obligations and quotas (RED III), a national ETS, and EU accession

Priority actions (12–24 months):

- ✓ Full registry operation (Res. No. 1242 in force ~01/2027)
- ✓ Transposition of RED II and RED III
- ✓ Registry data model compatible with the UDB – amendments to secondary legislation (Gas Codes)
- ✓ EU–UA agreement on GO recognition



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