



I-TRACK(G) CODE

PUBLIC

CONSULTATION

REPORT



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**The International
Tracking Standard
Foundation**

Founder of I-REC

INTRODUCTION

ABOUT THIS DOCUMENT

This document presents the main results from the public consultation on the I-TRACK(G) Code draft held between May 26th and July 28th of 2025. A total of 52 observations received from 8 entities, who act separately and cover five continents, bring to the process a variety of perspectives that contribute to a more robust and higher quality instrument reflecting the broad interest in its development.

RESPONDENT ENTITIES INCLUDE

- Energy utilities (2),
- I-REC(E) traders (2),
- Biomethane standardization body (1),
- I-REC(E) Issuer (1),
- I-REC(E) Platform Operator (1), and
- EAC international expert (1)

FEEDBACK

Feedback in the report consists of official comments received from the respondent entities (or, in some cases, extracts from longer reports), followed by the official unified reply from the Foundation together with the I-TRACK(G) Code Manager.

INTRODUCTION

ABOUT THE I-TRACK(G) CODE

The I-TRACK(G) Code governs the certification process for Biogas and Biomethane in line with the International Tracking Standard Foundation's key governing document, the International Attribute Tracking Standard (Standard). The I-TRACK(G) Code is the culmination of a Product Code development process that began in May 2023 with the signing of an MoU (Memorandum of Understanding) between the I-TRACK Foundation and an international consortium formed by Evident, the Code Manager for the I-REC(E), Instituto Totum, the local Issuer of I-REC(E) in Brazil, and M-RETS.

Once finalized, I-TRACK(G) will be available for use in a variety of compliance and voluntary markets, including Scope 1 reporting, national energy reporting, and general End-user claims, and those of low or net-zero-carbon products.

The consortium will act as the collective Code Manager for this Product Code through a special-purpose entity called "Global Gas Tracking". The extensive experience from the three partners includes the Brazilian "GAS-REC" program run by Instituto Totum, the Renewable Thermal Certificates (RTC) markets in the USA run by M-RETS, and the various Energy Attribute Certificate (EAC) services provided by Evident.

FEEDBACK RECEIVED AND UNIFIED REPLY FROM THE I-TRACK FOUNDATION AND THE CODE MANAGER

2.1

CHAIN OF CUSTODY

2.1.1 FEEDBACK

Clearly define jurisdictional limits for book-and-claim and mass-balance models—particularly important in regions with limited gas infrastructure (e.g., parts of Asia-Pacific)

2.1.1 I-TRACK FOUNDATION REPLY

Unless the final use location is known prior to Issuance, chain of custody claims may be added later, provided that evidence is submitted to demonstrate the certificate's chain of custody throughout its life cycle up to the point of Redemption. This can theoretically be facilitated through a Redemption Label, as defined in the International Attribute Trackign Standard. It is expected that Labelling Authorities who manage Redemption Labels will define the specific requirements and conditions governing the use of particular chain of custody labels.

2.1.2 FEEDBACK

Consider to define what is meant with mass-balancing, given multiple interpretations around the globe. Option to refer to the upcoming ISO13662 standard (where it is expected to require some additional transparency on the characteristics of the mass-balancing model applied).

2.1.2 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code provides a framework in Section 1.3.1 Chain of Custody for I-TRACK(G). Once ISO 13662 is released, or the I-TRACK Foundation publishes official documents on chain of custody concepts, the Code may be revised to incorporate more detailed and harmonized definitions. Regardless, as mentioned previously, this can theoretically be facilitated by third parties as well through a Redemption Label, as defined in the Standard. It is expected that Labelling Authorities who manage Redemption Labels will define the specific requirements and conditions governing the use of particular chain of custody labels.

2.1.3 FEEDBACK

Clearly define jurisdictional limits for book-and-claim and mass-balance models—particularly important in regions with limited gas infrastructure (e.g., parts of Asia-Pacific)

2.1.3 I-TRACK FOUNDATION REPLY

Unless the final use location is known prior to Issuance, chain of custody claims may be added later, provided that evidence is submitted to demonstrate the certificate's chain of custody throughout its life cycle up to the point of Redemption. This can theoretically be facilitated through a Redemption Label, as defined in the Standard. It is expected that Labelling Authorities who manage Redemption Labels will define the specific requirements and conditions governing the use of particular chain of custody labels.

CHAIN OF CUSTODY

2.1.4 FEEDBACK

Section 1.3.1 Chain of Custody for I-TRACK(G) / 6.4 Issuers / 8.2 Product Facility Registration & 8.4 Other Tracking Schemes - Adopt ISCC EU interconnected pipeline mass balance framework and GreenPower (Foundation note: Australia specific) feedstock provisions.

2.1.4 I-TRACK FOUNDATION REPLY

The suggested definition may be adopted as one of the approved chain of custody definitions; however, the I-TRACK(G) Code cannot mandate its use. As a neutral tracking scheme providing information, requiring it would exceed the I-TRACK(G) Code's scope. Users are welcome to apply this mass balance framework, but the Code will never require its use, as doing so would restrict other mass balance definitions or limit the ability to trade using molecules on a book-and-claim, segregated or other mass-balance definition.

2.1.5 FEEDBACK

Section 4.3 Eligible Production Facility Types / 8.3.1 Certificate Data Fields & Section 8.4 Other Tracking Schemes - Establish comprehensive Bio-LNG chain-of-custody enabling mass balance from production through marine transport to end-user.

2.1.5 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code permits multiple chain of custody models and distribution types (e.g., Bio-LNG via marine transport, Bio-GNC via trucks, and others). This approach relies on the recognition of locally developed and approved quality chain of custody or mass balance schemes, ensuring flexibility and broad applicability across diverse markets and regulatory environments.

2.1.6 FEEDBACK

Active promotion of I-TRACK(G) mass balance approach to support global harmonization.

2.1.6 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code allows multiple chains of custody models and distribution types (e.g., Bio-LNG via marine transport, Bio-GNC via trucks, and others). This approach relies on the recognition of locally developed and approved quality chain of custody or mass balance schemes, ensuring flexibility and broad applicability across diverse markets and regulatory environments.

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The I-TRACK(G) Code allows multiple chains of custody models and distribution types (e.g., Bio-LNG via marine transport, Bio-GNC via trucks, and others). This approach relies on the recognition of locally developed and approved quality chain of custody or mass balance schemes, ensuring flexibility and broad applicability across diverse markets and regulatory environments.

2.2

REGULATORY SCOPE AND COUNTRY SPECIFIC RULES

2.2.1 FEEDBACK

Clarify whether the I-TRACK(G) code and certificates are meant to cover all global markets, including the European Union, or if I-TRACK(G) is intended only for markets in North America (the United States and Canada) and emerging markets outside of the EU. This clarification is important because certificates for biogas and biomethane already exist within the EU and the current draft code does not address the EU.

2.2.1 I-TRACK FOUNDATION REPLY

Market issuance is determined by the I-TRACK Foundation Board and will later be published in a list of “Authorized Issuance Countries.” However, it is not the I-TRACK Foundation’s intention to implement an I-TRACK(G) mechanism in countries where a reliable, robust, and well-organised governmentally recognized alternative tracking system exists.

2.2.2 FEEDBACK

The code successfully establishes an international framework with a process for authorizing issuance in new countries. However, to facilitate a truly global market, we recommend that the code provide more explicit rules governing the cross-border transfer and use of I-TRACK(G) certificates. For an importing country, confidence in the system will depend on clear answers to questions such as:

Can an I-TRACK(G) certificate issued in one country be transferred to a participant in another country and be redeemed against consumption in that second country? What are the specific registry processes that will ensure the integrity of such cross-border transactions and prevent any risk of double-counting between different national schemes?

2.2.2 I-TRACK FOUNDATION REPLY

Similar to the I-REC for Electricity (I-REC(E)), the I-TRACK(G) Code does not limit specific rules for the acceptance of cross-border certificates. However, there will be country-specific reporting standards that have criteria related to cross-border usage. In general, to demonstrate a chain of custody—such as mass-balance or segregation—additional details are required to ensure that the transfer from one location to another complies with the relevant chain of custody definition required by a national regulatory body or standard-setting body.

2.2.3 FEEDBACK

Section 3.1 Regulatory Scope and Country Specific Rules - Develop comprehensive I-TRACK(G) rules using GreenPower (I-TRACK Foundation note: Australia specific) as a reference point, not requiring dual certification.

2.2.3 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code may use GreenPower as a reference point and would not require dual certification. This approach is intended to ensure mutual recognition and provide flexibility across diverse markets and regulatory environments.

REGULATORY SCOPE AND COUNTRY SPECIFIC RULES

2.2.4 FEEDBACK

Section 3.1 Regulatory Scope and Country Specific Rules / 8.4 Other Tracking Schemes & 7.5 Access to Data - Leverage Australia's NGER interconnected network recognition as implementation model for global application.

2.2.4 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code cannot adopt a single application model as a global standard but allows for specific application models depending on the regulations applicable in each country or specific situation.

2.2.5 FEEDBACK

Will it be possible to accredit the I-TRACK(G) in the Carbon Credit Compensation System (Foundation note: Chile specific) in the future? Will the I-TRACK(G) alone be able to accredit the reduction in CO2 emissions?

2.2.5 I-TRACK FOUNDATION REPLY

The use of I-TRACK(G) for compliance purposes requires recognition by the relevant national authorities and acceptance as a valid compliance instrument.

The I-TRACK Foundation recognizes the importance of national and international acceptance of the I-TRACK(G) mechanism; however, this matter is beyond the scope of the current public consultation. Both the I-TRACK Foundation and the I-TRACK(G) Code Manager actively promote the global recognition of I-TRACK(G), including its acceptance by existing and future emission reduction compliance schemes, as well as consumer emission reduction claim standards.

2.2.6 FEEDBACK

Given that the EU's CBAM provides methodologies for companies to claim consumption of biomass-derived energy from shared grids based on source-stream calculation and mass balancing, will the I-TRACK (G) code allow for interaction with the certified voluntary schemes for mass balancing in a way that let's companies use the I-TRACK (G) certificates to claim emission reductions under the CBAM (and thus reduce the obligation to purchase CBAM quotas)?

On first look, it seems like the possibility to link I-TRACK (G) certificates with other labels might be a useful way to ensure sustainability and GHG reduction certificates in line with the Renewable Energy Directive §§ 29-31.

2.2.6 I-TRACK FOUNDATION REPLY

The use of I-TRACK(G) for compliance purposes requires recognition by the relevant national authorities and acceptance as a valid compliance instrument.

The I-TRACK Foundation acknowledges the importance of international certificate acceptance; however, this issue falls outside the scope of the current public consultation. Both the I-TRACK Foundation and the I-TRACK(G) Code Manager actively advocate for the global recognition of I-TRACK(G), including its acceptance by existing and future emission reduction compliance schemes, as well as consumer emission reduction claim standards.

I-TRACK STANDARD INTEROPERABILITY GUIDANCE

2.3.1 FEEDBACK

Provide early, detailed interoperability guidance for issuing I-REC(E) after I-TRACK(G) redemption; this is time-critical for emerging markets.

2.3.1 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation, in collaboration with the Code Manager of I-REC(E), is developing acceptance criteria for interoperability and the conversion of I-TRACK(G) certificates into I-REC(E) certificates ("stacking"). By requiring the redemption of I-TRACK(G) certificates, this process ensures that all environmental attributes associated with the fuel source are verified and recorded, thereby safeguarding the integrity of subsequent I-REC(E) issuance.

2.3.2 FEEDBACK

Clarify eligibility of "stacking" I-TRACK(G) with I-REC(E) across different custody models and any time limits.

2.3.2 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation is working together with the Code Manager of the I-REC(E) to define the acceptance criteria for interoperability and conversion of I-TRACK(G) into I-REC(E) certificates ("stacking").

2.3.2 FEEDBACK

The code rightly addresses the critical interface between gas and electricity certification to prevent double claiming. However, the proposed mechanism for issuing an I-REC(E) after the redemption of an I-TRACK(G) is conditional on "I-TRACK Foundation pending interoperability guidance" (Section 4.5 Further Requirements). This ambiguity creates uncertainty for project developers and consumers, particularly in the power generation sector. We recommend that the final code, or a concurrently published document, provides:

- A clear and definitive process for this sequential certification.
- Detailed guidance on how "Stacking" (Section 3.2 Interoperability of Product Codes) will function in practice between different certificate products.
- A projected timeline for the finalization and release of the full interoperability guidance.

2.3.2 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation is collaborating with the I-REC(E) Code Manager to define acceptance criteria for interoperability and the conversion of I-TRACK(G) into I-REC(E) certificates ("stacking"). By requiring I-TRACK(G) redemption, the process ensures that all environmental attributes related to the fuel source are verified and recorded, thereby supporting the integrity of downstream I-REC(E) issuance.

2.4

DISTRIBUTION METHODS

2.4.1 FEEDBACK

Section 4.3.1 Eligible Processes and Figure 1 Gas Production Process. Expand the list of eligible distribution types beyond "Pipeline" and "Truck" to include options such as waterborne vessels (LNG tanker, container ship, etc.).

2.4.1 I-TRACK FOUNDATION REPLY

Sections 4.3.1 Eligible Processes and 4.5 Further Requirements of the I-TRACK(G) Code has been updated in the next version to clarify the exclusion of fugitive emissions from biogas and biomethane, as well as to expand the scope of eligible distribution types.

2.5

DISTRIBUTION METHODS

2.5.1 FEEDBACK

Definition of "Effective Registration Date" is unclear.

2.5.1 I-TRACK FOUNDATION REPLY

The definition of Effective Registration Date has been amended in the next version of the I-TRACK(G) Code in accordance with sections 4.4 Eligibility for Historic Production and 8.3.2 Eligible Production Periods.

2.5.2 FEEDBACK

Confirm the Effective Registration Date is the date on which both 1 and 2 are fulfilled

- The first day of a Production Period premised in the relevant Product Code (For example, in the year 20XX, a Registrant will be able to request the Issuance of ITRACK(G) for gas production that occurred in 20XX - 2)
- The date from which the owner of a Production Facility grants exclusivity for the attributes of the Production Facility to a responsible Entity

2.5.2 I-TRACK FOUNDATION REPLY

The definition of Effective Registration Date has been amended in the next version of the I-TRACK(G) Code in accordance with sections 4.4 Eligibility for Historic Production and 8.3.2 Eligible Production Periods.

REGISTRIES & ISSUERS

2.6.1 FEEDBACK

1.1 Section 6.3 Registry Operator. Wording should allow for additional registry operators beyond Instituto Totum, M-RETS and Evident to be added in the future.

2.6.1 I-TRACK FOUNDATION REPLY

Registries must be Accredited by the I-TRACK Foundation, in coordination with the Code Manager. Where a national program substantially aligns with the requirements of I-TRACK(G), its registry may be evaluated for compliance. If confirmed, it can be recognized and included among the list of I-TRACK(G) Accredited Registries and implemented on a national basis. Beyond this, Platform Operators can still play a global role with IT Platforms linked to the various national registries.

2.6.2 FEEDBACK

Section 6.4 Issuers. Clarify whether Evident should automatically serve as the Issuer outside the US, Canada and Brazil, or if alternatives will be accepted.

2.6.2 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation's goal is to ensure that issuers remain, to the extent logical and feasible, independent from Registries. In line with this principle, the Issuer hierarchy provides that while a default issuer may be designated for each Registry, priority is given first to local for-profit or non-profit organizations, with the highest priority reserved for government-approved Issuers.

To support this framework, supplementary documents will be developed, including a list of eligible countries and the corresponding market operators—such as Issuers and Registries—active within each jurisdiction.

2.7

LIFE CYCLE ASSESSMENT AND ASSURANCE SERVICE PROVIDERS

2.7.1 FEEDBACK

Section 6.10 Assurance Service Providers. Publish a country-by-country list of approved Assurance Service Providers (ASPs); finding qualified verifiers across all environmental markets can be challenging.

2.7.1 I-TRACK FOUNDATION REPLY

Section 6.9 Lyfe Cycle Assessment Service Providers has been amended to provide further clarification:

"LCA Service Providers and ASPs must be independent entities, accredited either by a recognized national or international accreditation body (e.g., ISO/IEC 17029/14065) or by a relevant government authority. The Code Manager will define and publish minimum criteria for competence, independence, and reporting, and may also conduct audits and oversight. Issuers or Registrants may contract directly with eligible providers."

This accreditation framework is designed to ensure impartiality, technical competence, and compliance with strict quality standards.

2.7

LIFE CYCLE ASSESSMENT AND ASSURANCE SERVICE PROVIDERS

2.7.2 FEEDBACK

Sections 6.9 Life Cycle Assessment Service Providers & 6.10 Assurance Service Providers. Broaden Accreditation Acceptance and Strengthen Independence for LCA Service Providers and ASPs. The Code currently requires that Life Cycle Assessment Service Providers and Assurance Service Providers (ASPs) be accredited solely by the Code Manager.

This approach:

- Restricts provider eligibility,
- Risks, real and perceived conflicts of interest,
- May limit market access, and
- Does not reflect global best practice as seen with VCS, RED II, and others.

Recommendation & Proposed Amendment: Permit LCA Service Providers and ASPs accredited by reputable international or national bodies (e.g., ISO/IEC, IAF, or government authorities under ISO 14065/17029) to act in these roles. The Code Manager should set and publish minimum competence and independence criteria, and retain oversight/audit rights, but not act as a gatekeeper. Allow issuers to contract directly with accredited entities. Recognize official government/statutory lab data as equivalent where relevant.

Proposed Text: "LCA Service Providers and ASPs must be independent entities, accredited by a recognized national/international accreditation body (e.g., ISO/IEC 17029/14065), or by a relevant government authority. The Code Manager will set and publish minimum competence, independence, and reporting criteria and may conduct audits and oversight. Issuers may contract directly with eligible providers."

2.7.2 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation and Consortium agree with the proposed text, with minor adjustments included in Section 6.9:

"LCA Service Providers and ASPs must be independent entities, accredited by a recognized national or international accreditation body (e.g., ISO/IEC 17029/14065) or by a relevant government authority. The Code Manager will establish and publish minimum competence, independence, and reporting criteria and may conduct audits and oversight. Issuers or Registrants may contract directly with eligible providers. Additionally, Issuers may define specific rules governing the acceptance and qualification of LCA or ASP Service Providers, ensuring alignment with the criteria established by the Code Manager and the I-TRACK Foundation."

2.8

LABELS

2.8.1 FEEDBACK

In reference to section 8.3.1 Certificate Data Fields, which mentions “Labels (e.g., eligibility flags or sustainability certifications)”. Provide clarification on the different sustainability labels that will or could be added to I-TRACK(G) certificates. This clarification should include guidance on how these labels will be tracked and how they will interact with any local requirements and/or local instruments, particularly so that double issuance of attributes is avoided. For example, the EU Proof of Sustainability/Sustainability Declaration (POS) is an additional certification that is used in the EU. I-TRACK(G) should clarify if sustainability certifications are required or optional, and which certifications are eligible for the I-TRACK(G) code.

2.8.1 I-TRACK FOUNDATION REPLY

Labelling documents are yet to be developed by the relevant Labelling Authorities. While labels may be required for certain external purposes, the I-TRACK Foundation will never mandate that a label be added to the certificate.

2.8.2 FEEDBACK

Section 4.5 Further Requirements. Ensure an I-TRACK certificate and a Proof of Sustainability/Sustainability Declaration can be issued together without being separated—e.g., by embedding reciprocal unique IDs.

2.8.2 I-TRACK FOUNDATION REPLY

Information from PoS (Proof of Sustainability) and SD (Sustainability Declaration) is complementary and may be incorporated into I-TRACK(G) certificates, as outlined in Section 8.3.1 Certificate Data Fields, under Labels (e.g., eligibility flags or sustainability certifications). Such information may be included at the point of issuance.

2.8.3 FEEDBACK

Clearly define any and all additional labels, along with the specific attributes to be included in Section 8.3.1 Certificate Data Fields. This includes identifying which attributes and labels are required and which are voluntary.

2.8.3 I-TRACK FOUNDATION REPLY

It is not within the scope of the I-TRACK Foundation or the Code Manager to define these requirements. As noted above, labels may be required for certain external purposes, but the I-TRACK Foundation will never mandate that a label be added to the certificate.

2.8.1 FEEDBACK

In reference to section 8.3.1 Certificate Data Fields, which mentions “Labels (e.g., eligibility flags or sustainability certifications)”. Provide clarification on the different sustainability labels that will or could be added to I-TRACK(G) certificates. This clarification should include guidance on how these labels will be tracked and how they will interact with any local requirements and/or local instruments, particularly so that double issuance of attributes is avoided. For example, the EU Proof of Sustainability/Sustainability Declaration (POS) is an additional certification that is used in the EU. I-TRACK(G) should clarify if sustainability certifications are required or optional, and which certifications are eligible for the I-TRACK(G) code.

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Clearly define any and all additional labels, along with the specific attributes to be included in Section 8.3.1 Certificate Data Fields. This includes identifying which attributes and labels are required and which are voluntary.

2.8.3 I-TRACK FOUNDATION REPLY

It is not within the scope of the I-TRACK Foundation or the Code Manager to define these requirements. As noted above, labels may be required for certain external purposes, but the I-TRACK Foundation will never mandate that a label be added to the certificate.

2.8.4 FEEDBACK

1.1 Section 4.1 Eligible Feedstock Types & 4.2 Mixed Feedstocks - Implement GreenPower-style (Foundation note: Australia specific) energy crop limitations to prevent food competition and land use conflicts.

2.8.4 I-TRACK FOUNDATION REPLY

GreenPower could be used as a sustainability label on a local basis (eg: Australia), but it cannot be mandated as a global standard in the Product Code.

2.9

GOVERNANCE AND MULTI-ROLE TRANSPARENCY

2.9.1 FEEDBACK

Sections 5.1.3 Independence / 5.1.6 Entry Barriers and Non-Discrimination / 6.11 Labelling Authorities & 8.3 Certificate Issuing. Clarify Labelling Process Ownership and Multi-Role Transparency. The Code lacks clear, stepwise procedures for the creation, approval, documentation, and monitoring of labels. There is no explicit conflict-management guidance when Accredited Entities (e.g., Issuer) wish to serve as Labelling Authority, nor operational doctrine for multi-role participation and separation.

Recommendation & Proposed Amendment:

- Add a clear process for the creation, review, documentation, and ongoing monitoring of labels/schemes, specifying the minimum documentation and role of the Code Manager.
- Where an Accredited Entity (Issuer, ASP, Labelling Authority) holds multiple roles, require:
- Full disclosure and conflict-of-interest management plan,
- Procedural/personnel separation ("ring-fencing") of conflicting functions,
- Regular audit/oversight by the Code Manager, with outcomes reported to stakeholders.
- State that label approval/renewal is conditional on ongoing adherence to these measures.

Proposed Text:

"Where any Accredited Entity assumes multiple roles (e.g., Issuer and Labelling Authority), a conflict-of-interest management plan must be developed and submitted to the Code Manager and I-TRACK Foundation prior to approval. The Code Manager will publish guidelines for ring-fencing, process documentation, and periodic audit. Label approvals and ongoing multi-role operation are subject to continued compliance with these requirements."

2.9.1 I-TRACK FOUNDATION REPLY

Further clarification has been added to Section 5.1.3:

"When an Accredited Entity assumes multiple roles (e.g., Issuer and Labelling Authority), a conflict-of-interest management plan must be developed and submitted to the Code Manager and the I-TRACK Foundation as part of the approval process. The Code Manager will publish guidelines for ring-fencing, process documentation, and periodic audits. Label approvals and ongoing multi-role operations are subject to continued compliance with these requirements."

2.9.2 FEEDBACK

Sections 6.10 Assurance Service Providers / 8.2.3 Verification / 8.4.1 Hierarchy of Evidence & 8.4.4 Verification of Evidence. Clarifying the Roles of ASP, Issuer, and Production Auditor in Verification Methodology and Ongoing Issuance. The current Code does not clearly distinguish operational roles or workflows concerning the ongoing assurance of gas production measurement for certificate issuance, specifically:

- The responsibility of the Assurance Service Provider (ASP) to review available evidence and define the verification methodology during device/facility registration.
- The fact that, so long as future Issue Requests strictly follow the agreed evidence and methodology (e.g., meter type, calibration, fallback estimation), the Issuer should be able to process certifications without requiring repeat ASP review every time;
- The need for a clear trigger: Where submitted evidence deviates from the ASP-approved methodology in any subsequent Issue Request—such as changes to feedstock, calorific value, meter, calibration, or data sources—the Issuer must appoint an independent Production Auditor for review and approval before continued issuance.
- Observed Gaps (with Code References):
- 6.10 assigns ASP as a “Verification Authority” but does not state if review is required at every Issue Request or only at registration.
- 8.2.3 (Verification) and 8.2.4 (Registration) require ongoing updates for changed facility/evidence, but do not formalize an escalation trigger for Production Auditor involvement;
- 8.4.1 and 8.4.4 do not detail if/when ASP verification at registration can be “relied on” for later standard issuances, nor how the Issuer should escalate when evidence changes.
- Recommendation & Proposed Amendment:
- At initial registration, require the ASP to review and select the appropriate verification methodology, tailored to the available data/situation; this methodology must be documented and approved by the Issuer.
- For future Issue Requests, the Issuer may rely on this methodology as long as all data/evidence matches the originally approved setup.
- If any new Issue Request presents material changes or deviations from the approved methodology (such as meter, calibration status, feedstock, or calorific value changes), the Issuer must mandate independent review by a Production Auditor before proceeding.
- Every such decision and underlying rationale must be fully documented and retained for audit.

Proposed Text:

“At the time of facility/device registration, the Assurance Service Provider (ASP) shall review all available evidence and select the applicable verification methodology for measured gas volume, which must be clearly documented and approved.

For subsequent Issue Requests, the Issuer may proceed with certificate issuance as long as evidence and data provided conform to the ASP-approved methodology.

If any significant deviation or change to the measurement methodology or source evidence occurs (e.g., new meter, calibration lapse, feedstock or calorific value changes), the Issuer shall refer the request to an independent Production Auditor for review before further issuance. All methodology selections, deviations, escalations, and Production Auditor findings shall be documented and made available for audit.”

Benefits:

- Ensures efficient and consistent issuance when operational conditions are unchanged,
- Guarantees robust, independent review only when material circumstances warrant it, minimizing unnecessary re-verification,
- Reduces risk of error, fraud, or drift from the original approved methodology,
- Strengthens auditability, reliability, and market/regulatory confidence.

GOVERNANCE AND MULTI-ROLE TRANSPARENCY

2.9.2 I-TRACK FOUNDATION REPLY

Further clarification has been added to Sections 6.10 and 8.4.4:

"At the time of Production Facility registration, the Assurance Service Provider (ASP) shall review all available evidence and select the appropriate verification methodology for measured gas volume, which must be clearly documented and approved."

"For subsequent Issue Requests, the Issuer may proceed with certificate issuance provided that the evidence and data supplied conform to the ASP-approved methodology."

"If any significant deviation or change occurs in the measurement methodology or source evidence (e.g., new meter, calibration lapse, feedstock, or calorific value changes), the Issuer must refer the request to an independent Production Auditor for review before further issuance. All methodology selections, deviations, escalations, and Production Auditor findings shall be documented and made available for audit."

2.10

GOVERNANCE AND MULTI-ROLE TRANSPARENCY

2.10.1 FEEDBACK

Supportive of publishing a list of Registrants and Participants; improves market transparency.

2.10.1 I-TRACK FOUNDATION REPLY

A list of Participants and active facilities per Registry will be published for market transparency.

2.11

GOVERNANCE AND MULTI-ROLE TRANSPARENCY

2.11.1 FEEDBACK

Section 8.2.1 Required Information. Clarify how the calorific value will be used—solely as a biogas contributor in calculating MMBtu, or also to qualify the final product?

2.11.1 I-TRACK FOUNDATION REPLY

A clarification in section 8.2.1 of the I-TRACK(G) Code specifies that the "lower" calorific value is to be used for both biogas and biomethane, when necessary. An appendix with standard conversion factors has been included to the I-TRACK(G) Code for users' reference.

2.11.2 FEEDBACK

Clearly define when biogas or biomethane is injected into a pipeline or common carrier network and for when it is not. This should also be included in an I-TRACK(G) certificate as a specific attribute or flag, and listed in 8.3.1. Certificate Data Fields

2.11.2 I-TRACK FOUNDATION REPLY

Further clarification was introduced in section 8.3.1 of the I-TRACK(G): "Point of consumption, injection or transport, if applicable."

2.12

CARBON INTENSITY & LCA METHODOLOGY

2.12.1 FEEDBACK

Section 8.2.2 Carbon Intensity. State whether the carbon-intensity calculator will be subject to Country-Specific Rules. If yes, identify the model on each I-TRACK(G) certificate in addition to lifecycle scope (full vs. partial).

2.12.1 I-TRACK FOUNDATION REPLY

Approved carbon intensity methodologies will be listed publicly.

2.12.2 FEEDBACK

Section 8.2 Product Facility Registration. Establish multiple acceptable LCA methodologies with ISCC EU as primary reference, excluding feedstock sustainability criteria and using GreenPower (Foundation note: Australia specific) emissions intensity for smaller projects.

2.12.2 I-TRACK FOUNDATION REPLY

Methodologies for LCA will be approved on a local basis. However, the I-TRACK(G) Code cannot mandate or promote any specific methodology as a primary reference. The following text has been added to Section 8.2.2:

"For the purposes of conformity with this Product Code, although carbon intensity is not a mandatory requirement, when used, only methodologies approved on a country-to-country basis will be accepted."

2.13

UNITS & CONVERSIONS

2.13.1 FEEDBACK

Adopt one global trading unit (MMBtu) to ease adoption.

2.13.1 I-TRACK FOUNDATION REPLY

The global trading unit for I-TRACK(G) is the MMBtu, as defined in the Code. An appendix with standard conversion factors has been added to the revised Code, and Section 8.4.3 Conversion has been clarified accordingly.

2.13.2 FEEDBACK

Include official, static conversion tables for common regional units (Dth, MWh, m³). Current Section 8.4.3 Conversion only covers lower-BTU biogas adjustments.

2.13.2 I-TRACK FOUNDATION REPLY

The global trading unit for I-TRACK(G) is the MMBtu, as defined in the Code. An appendix with standard conversion factors has been added to the revised Code, and Section 8.4.3 has been clarified accordingly.

2.13

UNITS & CONVERSIONS

2.13.3 FEEDBACK

Conversion Issuance rules (like in CEN EN16325:2025 and EECS , search for Conversion Issuance), to prevent double counting across conversion, and include a “Conversion Tag” (like in EECS Fact Sheet 23). More background study on coordinated conversion processes is available in REGATRACE reports D4.3 & D4.4

2.13.3 I-TRACK FOUNDATION REPLY

This item will be considered in a future review of the Code. In the meantime, the revised Code includes an appendix with standard conversion factors, along with a clarification in Section 8.4.3.

2.13.4 FEEDBACK

Clarification whether the gas is measured in upper calorific value or lower calorific value. This impacts the quantity of certificates issued for the same unit of gas, but without being explicit, it can artificially blow up the amounts of certificates and lead to NGO blame. Note further that in the EU, EN16325:2025 GOs are issued in MWh (or in Wh) expressed in upper calorific value (also called “higher heating value”), yet this may be under discussion in the upcoming revision. This is why in EECS, it is just a data field on the EECS certificates to express whether the unit of energy relates to the upper or lower calorific value.

2.13.4 I-TRACK FOUNDATION REPLY

Section 8.2.1 of the I-TRACK(G) Code clarifies that the lower calorific value must be used for both biogas and biomethane, where applicable. For users’ reference, the Code also includes an appendix with standard conversion factors.

2.13.5 FEEDBACK

Clearly define the various methane content levels (medium BTU vs. high BTU) that may be supplied in an I-TRACK(G) certificate. These definitions sometimes vary by country and in some markets, distinguishing the methane content level is unclear.

2.13.5 I-TRACK FOUNDATION REPLY

Section 8.2.1 of the I-TRACK(G) Code clarifies that the “lower” calorific value should be used for both biogas and biomethane, where applicable. An appendix providing standard conversion factors has also been added to the I-TRACK(G) Code for user reference.

2.14

UNITS & CONVERSIONS

2.14.1 FEEDBACK

Section 8.3.1 Certificate Data Fields. Specify that the chain-of-custody label on an I-TRACK(G) certificate tracks delivery from biogas to biomethane, not from biomethane to the end user (reason being that at production the end use delivery method might not yet be known)

2.14.1 I-TRACK FOUNDATION REPLY

Further clarification has been added in Section 8.3.1 of the I-TRACK(G) Code regarding chain of custody. Specifically:

"If a beneficiary wishes to make any claim concerning the chain of custody - beyond the point of consumption, injection, or transport - they must submit audited data supporting the claim. Only then can the information be included in the certificate."

2.14.2 FEEDBACK

Explication on the certificates of the Type of Gas for which the certificate is issued, like in EECS fact sheet 22 section 1, (called Energy Carriers in the EN16325:2025 standard for guarantees of origin). Without clarifying the type of gas, much discussion results from the intransparency. Or provide a clear definition of biomethane and biogas. Is there a point in transporting and tracking un-upgraded biogas if the methane content <60%?

2.14.2 I-TRACK FOUNDATION REPLY

The International Attribute Tracking Standard (Standard) explicitly applies to both biogas and biomethane. At the time of registration, facilities must provide evidence specifying whether their end product is biogas or biomethane, as outlined in the third bullet point of Section 8.2.1 of the Code.

2.14.3 FEEDBACK

Data fields on gas certificates like in EECS section O7 and O8. Optional data fields like Purity of Gas, or the additional criteria a gas complies with (can satisfy multiple consumer concerns)

2.14.3 I-TRACK FOUNDATION REPLY

Reviewed and further outline has been included in section 8.3.1

2.14.4 FEEDBACK

Section 8.3.1. Multi-unit display on Certificates for international market compatibility

2.14.4 I-TRACK FOUNDATION REPLY

The global trading unit for I-TRACK(G) is the MMBtu, as defined in the I-TRACK(G) Code. An appendix with standard conversion factors has been added to the revised I-TRACK(G) Code, and Section 8.4.3 has been clarified accordingly.

2.15

CARBON CREDITS

2.15.1 FEEDBACK

How is the coexistence of I-TRACK(G) certificates and carbon credits considered? Considering that the environmental attribute of carbon credits may be somewhat different from that of biogas or biomethane.

2.15.1 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code recognizes that the attributes included in a carbon offset may not be represented in an I-TRACK(G). Please refer to Section 8.5.3:

"Unless relevant legislation dictates otherwise, existing carbon offset rights must be explicitly included or excluded on an I-TRACK(G). Registrants shall confirm whether they hold the rights to any such avoided emissions, carbon offsets, or similar market instruments and irrevocably assign or exclude such rights on each issued I-TRACK(G)."

"Where applicable, the exclusion of carbon offset rights shall be clearly indicated on each I-TRACK(G) and visible to Participants and Beneficiaries."

Further guidance on this topic, including country-specific rules, is under development.

2.15.2 FEEDBACK

Does the I-TRACK(G) code allow the issuance of a certificate without considering the environmental attribute of CO₂ emission reduction? Apparently, the standard allows for the issuance of two types of certificates: one with CO₂ emission reductions (if carbon credits are issued) or one without emission reductions (if carbon credits are not issued). Clarification on this point would be appreciated.

2.15.2 I-TRACK FOUNDATION REPLY

The I-TRACK(G) Code recognizes that the attributes included in a carbon offset may not be represented in an I-TRACK(G). Please refer to Section 8.5.3 Carbon Offset:

"Unless relevant legislation dictates otherwise, existing carbon offset rights must be explicitly included or excluded on an I-TRACK(G). Registrants shall confirm whether they hold the rights to any such avoided emissions, carbon offsets, or similar market instruments and irrevocably assign or exclude such rights on each issued I-TRACK(G)."

"Where applicable, the exclusion of carbon offset rights shall be clearly indicated on each I-TRACK(G) and visible to Participants and Beneficiaries."

Further guidance on this topic, including country-specific rules, is under development.

2.16

CONSUMER CLAIM STANDARDS

2.16.1 FEEDBACK

I-TRACK to continue supporting and encouraging the approval of green gas certificates, like I-TRACK(G), for renewable energy use claims and emissions reductions in various climate reporting standards and initiatives, such as the Greenhouse Gas Protocol, the Science-Based Targets Initiative, CDP and RE100. The acceptance of these instruments in various voluntary climate standards and leadership initiatives and clear guidance on how to report them will help users better understand how purchases of I-TRACK(G) will enable them to reach their climate targets.

2.16.1 I-TRACK FOUNDATION REPLY

The I-TRACK Foundation recognizes the importance of international acceptance of certificates; however, this topic is beyond the scope of the current public consultation. Both the I-TRACK Foundation and the Code Manager actively promote the global recognition of I-TRACK(G), including its acceptance by existing and future emission reduction compliance schemes, as well as consumer emission reduction claim standards.

2.16.2 FEEDBACK

Section 8.2.3 Verification - Strengthen verification to anticipate future GHG Protocol requirements.

2.16.2 I-TRACK FOUNDATION REPLY

Strengthening verification in anticipation of future GHG Protocol requirements will be considered and incorporated in upcoming revisions of the I-TRACK(G) Code.

2.16.3 FEEDBACK

1.1 The code clearly defines a two-year window for issuance post-production. It also states that an issued certificate does not expire. However, it notes that its eligibility for a claim may be limited by the requirements of the end-user's reporting scheme (Section 8.6 Redemption and Assignment). This is a crucial distinction that may not be immediately obvious to all market participants. To enhance user understanding, we suggest:

Including illustrative examples of how different reporting standards (e.g., corporate GHG accounting, national compliance schemes) might impose their own time limits on the use of certificates.

Providing a best-practice recommendation on the timeframe between the gas generation date and the consumption date for which a claim is made, to promote market integrity and alignment with user expectations.

2.16.3 I-TRACK FOUNDATION REPLY

This topic is addressed in Section 5.2.1 Immutable Statement of Fact:

"The eligibility of an I-TRACK(G) for redemption may expire in accordance with the requirements of the Entity to which the redemption is reported, or as stipulated by applicable law. It is the responsibility of the purchaser of an I-TRACK(G) to ensure its validity under national legislation or for the intended purpose or reporting requirements."

2.17

ONBOARDING PROCESS FOR NEW COUNTRIES

2.17.1 FEEDBACK

Provide a formal pathway (and stakeholder roles) for proposing additional issuing countries; stakeholders are willing to assist.

2.17.1 I-TRACK FOUNDATION REPLY

The process for incorporating new countries into the I-TRACK(G) system will follow a similar approach to that established for I-REC(E), while also addressing additional country-specific information requirements. This process includes stakeholder engagement, consultation with national authorities, and assessment of the local regulatory context. The outcomes are compiled into a dedicated country report, which must be approved by the I-TRACK Foundation Board. Additional guidance, including a country report template, will be made available on the I-TRACK Foundation's website.

2.17.2 FEEDBACK

Provide clarity and transparency on the process(es) for new countries, registry operators, and issuers to get approved as such parties to the I-TRACK(G) code.

2.17.2 I-TRACK FOUNDATION REPLY

The process for incorporating new countries into the I-TRACK(G) system will mirror the approach used for I-REC(E) countries, with additional country-specific information requirements. This process includes engaging stakeholders, liaising with national authorities, and assessing the local regulatory context. All findings are compiled into a dedicated country report, which requires approval from the I-TRACK Foundation Board. Further guidance on incorporating new countries, including a country report template, will be made available on the Foundation's website.

2.17.3 FEEDBACK

Implementation Timeline. Clearly define the timeline and process for rolling out the I-TRACK(G) code. For instance, I-TRACK should clarify if the code will be released to some markets on a "pilot" basis first (such as Brazil and the US), or if I-TRACK intends to roll out the code globally at one time.

2.17.3 I-TRACK FOUNDATION REPLY

Implementation will follow a model similar to the I-REC(E) market, with market and country development led collaboratively by the Code Manager, the I-TRACK Foundation, and Market Players during the product roll-out phase.