



The I-TRACK Code for Biogas and Biomethane (the I-TRACK(G) Code)

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- Biogas and Biomethane Certificates - GAS-REC of Instituto Totum
- I-REC Code for Electricity (I-REC(E)) of Evident Ev Limited
- Renewable Thermal Certificates - RTCs of Midwest Renewable Energy Tracking, Inc. (“CleanCounts”)

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1. Introduction

This Product Code is the I-TRACK Code for Biogas and Biomethane (the I-TRACK(G) Code), a tracking certification for Biogas and Biomethane based on three pre-existing globally standardised codes: the “Renewable Thermal Certificates - RTCs” of CleanCounts, the “Biogas and Biomethane Certificates - GAS-REC” of Instituto Totum and the “I-REC Code for Electricity” of Evident. The intention is to provide a single international Product Code that can be implemented worldwide with consideration given to local legislative contexts for Biogas and Biomethane attribute tracking.

1.1 About the Code Manager

This I-TRACK(G) Code introduces a new Product under the International Attribute Tracking Standard (Standard) owned by the I-TRACK Foundation. Evident and Instituto Totum founded the company Global Gas Tracking headquartered in Brazil, which is the Accredited Code Manager for the I-TRACK(G) Code.

1.2 About the Founders

Evident offers Services to Market Entities needing Energy Attribute Certificate (EAC) Issuance, transfer, or Redemption, primarily representing electricity production from generators delivered to End Users. In this capacity, Evident takes on the roles of Code Manager and Registry Operator for the I-TRACK Foundation Accredited I-REC Code for Electricity, while multiple other Entities serve as Issuers.

Instituto Totum is Accredited by the I-TRACK Foundation as the local Issuer for I-REC(E) in Brazil. Since 2016, they have been responsible for the development and management of the Brazilian Renewable Energy Certification Program, in partnership with the Brazilian Association of Clean Energy (ABRAGEL) and the Brazilian Wind Energy Association (ABEEólica). Instituto Totum facilitates Biogas and Biomethane Certificate markets in Brazil by issuing a traceable digital certificate (GAS-REC) for each million British Thermal Units (MMBtu) of verified renewable gas registered on the platform. On the platform it is also possible to track carbon pathways, avoided methane, and carbon intensity (CI) values.

1.3 The Product Certificate: I-TRACK(G)

The I-TRACK(G) is a digital certification service that standardises the traceability of each MMBtu of Biogas or Biomethane produced, evidenced, and verified, from production to the point of consumption. Product Certificates (I-TRACK(G)) are issued based on energy, which avoids the various complexities between each type of gas when considering alternative measurement units such as volume.

The I-TRACK(G) follows a chain of custody tracking system that prevents double counting or double Beneficiary (End User) claims by ensuring that every unit of certified renewable gas has only one certificate from Issuance to retirement, connecting the production point with the final consumer in a Registry. The I-TRACK(G) is agnostic to the form of chain of custody used, whether book-and-claim, an approved mass balance definition, or complete molecular segregation.

1.3.1 Chain of Custody for I-TRACK(G)

While ISO 22095-3:2026 provides a standardized framework for chain of custody, this Product Code supports multiple certificate-based chain of custody models as set out below.

Chain of custody is the custodial sequence that occurs when the ownership or control of a certificate representing the associated environmental attributes of a verified unit of Biogas or Biomethane and its claims is transferred from one custodian to another along the supply chain.

For example, in the specific case of Biogas functioning as a feedstock to produce Biomethane, the clear relationship of environmental attributes along the chain of custody may be relevant for some consumers within the supply chain.

- In the **book and claim** chain of custody, the environmental attributes associated with the production of Biogas or Biomethane are separated from the physical product. The producer 'books' the attributes and can 'claim' to have generated a certain amount of renewable gas, even if the actual physical gas may not be delivered directly to the End User with the environmental attribute. In this way, the physical supply is entirely separated from the eventual procurement of the attribute certificates. This system allows the trade of certificates independent from the physical product so that the buyer of a certificate owns its associated attributes. Therefore, the buyer of the physical product will not be able to make any claims regarding those attributes.
- The **mass balance** approach tracks the total renewable gas in the system but does not require physical separation of renewable and non-renewable gas. Instead, it assigns renewable attributes proportionally to the renewable and non-renewable sources within a given system. This approach ensures that the total amount of renewable gas generated matches the total amount claimed within an interconnected pipeline system. I-TRACK certificates for Biogas or Biomethane (I-TRACK(G)) can accommodate various definitions, calculations, and methodologies that meet the mass balance concept.

- **Molecular segregation** involves physically isolating Biogas or Biomethane from non-renewable sources of natural gas throughout the supply chain. This ensures that the gas delivered to End Users is entirely from renewable sources, and the associated certificates can be claimed as such without mixing with non-renewable gas sources.

The role of the I-TRACK(G) Code is not to attest or certify the degree of traceability of the chain of custody, but the information contained in the I-TRACK(G) must be sufficient for the Beneficiary (End User) and for members of the chain of custody to have information that can identify the level of traceability of the environmental attributes of Biogas and Biomethane.

The I-TRACK(G) may be used with any chain of custody scheme. Each Participant may, at its discretion or according to rules provided by environmental target programs or applicable regulatory schemes in each jurisdiction, decide how to report their use of the I-TRACK(G).

2. Definitions

Plurals of defined terms shall be interpreted accordingly with these definitions.

Term	Definition
Account	A data store, or record, within a Registry relating to an Entity, in which a Product Certificate is held.
Accreditation Agreement	An agreement that is formalised between the I-TRACK Foundation and the Code Manager or other Accredited Entity.
Accredited or Accreditation	The act of acknowledging that a Product or Entity is compliant with the Standard.
Accredited Entity	An Entity that has achieved Accreditation.
Administrator	The Entity designated as the manager of the Infrastructure.
Anti-Money Laundering or AML	The anti-money laundering and other fraud prevention criteria as implemented based on applicable laws or otherwise applied in accordance with good industry practice.
Approved Tracking Scheme or ATS	An attribute tracking system accepted by a Code Manager as indirect evidence of production and production attributes.
Assignment or Assigned	The allocation of a redeemed Product Certificate to a specified End User for use in a Redemption Statement for a specified consumption period.
Assurance Service Provider or ASP	An entity approved by the Code Manager which validates and verifies all information and data associated with a Production Facility, Biogas, and Biomethane. This may also refer to a Verifier, Validator, or Auditor.
Beneficiary or End User	An End User to which a Product Certificate has been irrevocably Assigned as part of a Redemption transaction.
Biogas	A mixture of methane, CO ₂ and small quantities of other gases produced by anaerobic digestion of organic matter in an oxygen-free environment.
Biomethane	Near-pure source of methane produced by either “upgrading” Biogas or through the gasification of solid biomass followed by methanation.
Brand Assets	A collective term that includes all company names, trading names and styles, trademarks, logos, and marketing style sheets that are assets of an Entity.
Business Week	A period of seven calendar days plus an additional day for each public holiday observed in the applicable country during that period.
Carbon Intensity or CI	The GHG emissions (expressed as CO ₂ equivalent) per unit of a product, process, or Service.

Term	Definition
Code Manager	<p>An Entity that is responsible for defining a Product and coordinating Service operators within the scope of that Product. The nature of that Product and the Services provided are defined in a Product Code that is owned by the relevant Code Manager.</p> <p>In the context of this document, Global Gas Tracking is the Code Manager.</p>
Consumption Period	<p>A defined period over which an End User reports consumption or use of a Product Certificate.</p>
Core Records	<p>The records that Registries must, as a minimum, maintain. These include records of Production Facilities, Issuing events, Product Certificates, transfer events, Redemption events, and Entities interacting with the Registry.</p>
Effective Registration Date	<p>The date from which measurement data can be used to support certificate issuances, according to this Product Code. See sections 4.4. and 8.3.2.</p>
End User	<p>An Entity that uses, claims, redeems, or is the Beneficiary associated with the removal of a Product Certificate from a market.</p>
Entity	<p>An organisation or individual with 'legal person' status.</p>
Greenhouse Gas or GHG	<p>Greenhouse Gases are gaseous substances found in the atmosphere which absorb part of the infrared radiation emitted by the sun and reflected by the Earth's surface, making it difficult for this radiation (heat) to escape into space.</p> <p>The gases internationally recognised as Greenhouse Gases, regulated by the Kyoto Protocol, are Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), Sulphur Hexafluoride (SF₆), and two families of gases, Hydrofluorocarbon (HFC), and Perfluorocarbon (PFC).</p>
Infrastructure	<p>A Registry or Platform created to facilitate the ownership, transfer, trade, or visualisation of Products.</p>
Infrastructure Operator	<p>The owner of the relevant Infrastructure who must develop, procure, implement, and operate all Infrastructure in accordance with the principles and expectations of the International Tracking Standard Foundation Board (Board). An Infrastructure Operator is either a Registry Operator or a Platform Operator.</p>
International Tracking Standard Foundation: Founder of I-REC or the I-TRACK Foundation	<p>The governance body for the International Attribute Tracking Standard (Standard). A not-for-profit foundation that is independent of the various Entities that may be Accredited. The International Tracking Standard Foundation owns the Standard and is staffed and supported by a secretariat. Legally known as "Stichting I-REC" and founded in the Netherlands under Chamber of Commerce number 59458844.</p>

Term	Definition
International Tracking Standard Foundation Board or the Board	The legally mandated governance organ of the I-TRACK Foundation, as listed with the Dutch Chamber of Commerce.
I-TRACK(G)	A verified record (certificate) of gas production at a Biogas or Biomethane production plant under the scope of this Product Code in accordance with the Standard.
Issuance or Issue	The act of creating a record of one or more Product Certificates in an Account on a Registry.
Issue Request	A formal request by a Registrant of a Production Facility to an Issuer to Issue a Product Certificate in relation to that Production Facility against evidence provided for a given Production Period.
Issuer	An Issuer is responsible for processing Production Facility registrations, as well as Issue Requests relating to the activity of registered Production Facilities.
Issuance Deadline	The date by which Issue Requests must be submitted by a Registrant for review by an Issuer for any given Production Period.
Know your customer or KYC	The know your customer and other counterparty evaluation criteria as implemented based on applicable laws or otherwise applied in accordance with good industry practice.
Labelling Authority	An Entity that has established a set of criteria to indicate that a Production Facility or Product Certificate meets its standards (e.g., environmental). The Labelling Authority is solely responsible for determining whether its criteria are met.
Labelling Scheme or Label	A set of rules established by a Labelling Authority.
Life Cycle Study or Life Cycle Assessment or LCA	Compilation and evaluation of the inputs, and the environmental impacts, most notably global warming potential, of the Biogas or Biomethane throughout its life cycle.
Local Working Instructions or LWI	A document or set of documents adopted and owned by an Accredited Entity that set out procedures to ensure that the quality and integrity of the Product are defined.
Market Entity	An Entity that participates in the market but is not an Accredited, nor Approved, Entity.
Participant	An Entity who manages one or more trade or Redemption Accounts within a Registry. Participants are the specified owners of Product Certificates held within their Accounts. At the time of Redemption, a Participant may nominate a Beneficiary (End User) to receive rights to the Product Certificate. Participants do not require Accreditation.
Platform	Electronic Infrastructure capable of initiating requests for Issuance, transfer, or Redemption of Product Certificates held within a Registry, and is accessible to Entities other than Accredited Entities. Platforms are systems connected to, but separate, from a Registry. Infrastructure solely for the internal use of an Accredited Entity or Market Entity does not constitute a Platform.

Term	Definition
Platform Operator	An Entity responsible for providing and operating a Platform that provides functions that extend the functionality of a Registry. Platforms do not constitute a primary record of the custody of a Product Certificate but may remotely initiate actions within a Registry. Platform Operators may have varied commercial relationships, depending on the nature of their Platform.
Principles	A section in the Standard that provides guidance to the Board as to the core elements which support their decisions related to the adherence of Accredited Entities and Products.
Product	A unit of output or production whose attributes are being tracked. Examples include, but are not limited to, units of energy, fuel, materials, or gases.
Product Code	A document or set of documents that set out the rules and procedures, and other information required to form the specification of a Product.
Product Certificate	An attribute certificate that is a verified record of an event of production at a registered Production Facility Issued according to the Product Code Accredited under the Standard.
Production Auditor	An independent Entity whose role it is to verify the measured volume of eligible production stated in an Issue Request.
Production Facility	One or more related production units of Biogas or Biomethane (and associated ancillary equipment) capable of producing an eligible source of Biogas or Biomethane delivered through an identifiable measurement point. Production Facilities are considered distinct registrations if they are not geographically co-located or if less than 100% of the production is consumed by another related facility.
Production Facility Owner	The legally defined owner or owners of a Production Facility.
Production Period	A defined period over which a Production Facility reports its eligible production.
Redemption or Redeem	The act of using a Product Certificate for making a claim on the attributes or benefits. Redeeming removes the Product Certificate from circulation. Redemption may be accompanied by an Assignment to a Beneficiary. This is intended to be synonymous with the concept of 'Cancel' or 'Cancellation' in other schemes such as CEN/CENELEC EN 16325.
Redemption Statement	A statement that evidence Redemption. It is specified in the Product Code and may be uniquely verified in a secure manner by an Entity such as an auditor that does not have a user account on that Registry.

Term	Definition
Registrant	An Entity responsible for acting on behalf of the owner of a Production Facility regarding the registration of the facility for a specific Product and associated Issue Requests. The owner of a Production Facility may function as a Registrant. Registrants do not require Accreditation.
Registry	An Accredited database of Product Certificates that includes records of the full lifecycle of ownership and use of the Product Certificate. A Registry acts as a primary information source and may support multiple Product Certificates of differing types.
Registry Operator	An Entity responsible for providing and operating a Registry that records the Issuance, transfer, Redemption, and use of a Product Certificate as an immutable source of information.
Resolution Period	A set period during which an incompatibility is to be remedied.
Retail Tariff	The schedule of charges levied by a licensed gas supplier to a designated group of consumers. For this document, a Retail Tariff must be published by the gas supplier and provided to domestic and/or commercial consumers on common terms.
Service	Activities performed by an Accredited Entity in meeting its obligations under this Product Code.
Standard	The International Attribute Tracking Standard which describes the tools required for reliably and robustly implementing an attribute tracking system.
Stack/Stacking	The term Stack or Stacking refers to the aggregation and netting of attributes from different interoperable I-TRACK Product Certificates.
Universal Coordinated Time or UTC	A time standard by which the Core Records are to be timestamped.
Verification Label	A methodology, which is also a Label, which is approved for use by an Assurance Service Provider (ASP).

For consistent interpretation and implementation of this document, the following definitions are employed:

- the words “shall” and “must” indicate an obligation for compliance with the Code;
- the word “should” indicates a recommendation from the Code; and
- the words “may” or “can” indicate a permissible option the user may employ when implementing the Code.

3. Purpose and Principles

I-TRACK(G) represents the environmental attributes linked to Biogas or Biomethane from renewable sources of production. The Issuer may consider issuing I-TRACK(G) for Biogas or Biomethane combined with other non-renewable sources of gas if the resulting carbon intensity (CI) is lower than fossil gas. However, this shall be clearly noted on the certificate through a CI value.

The purpose of certification is to track the environmental attributes of Biogas and Biomethane, proving to consumers that the gas included in the certificate is from a renewable source with specific environmental attributes. In this way, certification serves as a centralised and trusted gateway to the environmental markets.

3.1 Regulatory Scope and Country-Specific Rules

This Product Code includes generic guidelines valid for all countries. Legislation or specific rules for each country or region shall be included in the Product Code through annexes that must be approved by the Code Manager. Country-specific rules must not conflict with the general rules of the Product Code and should address interaction with specific local programs (e.g., RFS/LCFS in the US or RenovaBio in Brazil).

This Product Code encompasses Services that are delivered primarily within a voluntary commercial environment. Where Services under this Product Code are provided within a legislative environment, that legislation shall take legal precedence over this Product Code.

The I-TRACK(G) Product Code provides policy-neutral certification that recognises the sovereignty of national authorities to develop and mandate national gas standards as they see necessary. National authorities can develop their own standards for the quality of the Biogas or Biomethane and have this displayed on the I-TRACK(G).

3.2 Interoperability of Product Codes

The Biogas and Biomethane supply chain involves several processes for which associated environmental attributes need to be tracked and certified. I-TRACK(G) allow different I-TRACK Foundation Accredited Product Code certificates to be combined to create a composite certificate to account for all these attributes. This process is known as Stacking.

4. Eligibility

4.1 Eligible Feedstock Types

Resource Type (Short Description)	Resource Type (Long Description)	Eligible Feedstock
BIG BIM	Biogas Biomethane	<ul style="list-style-type: none"> • A majority of the fuel source is one of the following: <ul style="list-style-type: none"> ○ agricultural and livestock products ○ wood products ○ agricultural and livestock by-products including waste. ○ mixed municipal solid waste ○ refuse-derived fuel. ○ industrial waste. • Primary woody or herbaceous vegetative matter (plants), including but not limited to wood, grasses, agricultural crops, or residues. • Processed vegetal materials from industry waste sources, including manufacturing, construction, or demolition. • Methane or other combustible gases derived from the processing or decay of plant, animal, or municipal solid waste materials. • Liquid fuels derived from plant or animal sources, including but not limited to ethanol, biodiesel, vegetable oil, or animal fats. • Mixed municipal solid waste (MSW) and refuse-derived fuel from MSW. • Landfill gas. • Animal waste.

For any resource or feedstock not listed, please contact the Code Manager.

4.2 Mixed Feedstocks

The I-TRACK(G) Product Code recognises that non-renewable fuels or gas may be blended with renewable fuels or gases in some cases (e.g., to achieve a specific heating value and/or meet other pipeline specifications). Any energy added by non-renewable fuels does not qualify and cannot be accounted for in I-TRACK(G). In these scenarios, self-reporting Entities, independent reporting Entities, and/or Assurance Service Providers (ASP) must demonstrate the overall percentage of renewable gas blended with non-renewable gas to their relevant local Issuers. If the relative quantities of renewable energy production from each feedstock cannot be measured or calculated, the Production Facility cannot register as a multi-feedstock generating unit.

Registrants must report 100% of the gas injected into a gas grid from the unit at the injection point, independent of the fuel type or if the gas will not be tracked as an I-TRACK(G). This ensures that I-TRACK(G) can serve as a central repository for programs, including those not affiliated with I-TRACK(G), to ensure against double-counting. Documentation of generation must be conducted using MMBtu as units or converted to MMBtu from another metering unit. If this is not possible, the Registrant must work this out with the (local) Issuer before uploading.

4.3 Eligible Production Facility Types

Production Facilities must comply with the eligible resource and listed feedstock types.

4.3.1 Eligible Processes

The diagram below shows an example of the possible processes for gas production. It is important to note that not all the produced Biogas is eligible for I-TRACK(G), as a portion of it is burned in a flare or fugitive biogas/biomethane. Within the figure, the gas products and fuels that meet the eligibility criteria for I-TRACK(G) have a tick (✓) next to them.

Figure 1 illustrates the list of eligible distribution types and applications.

Physical Flow

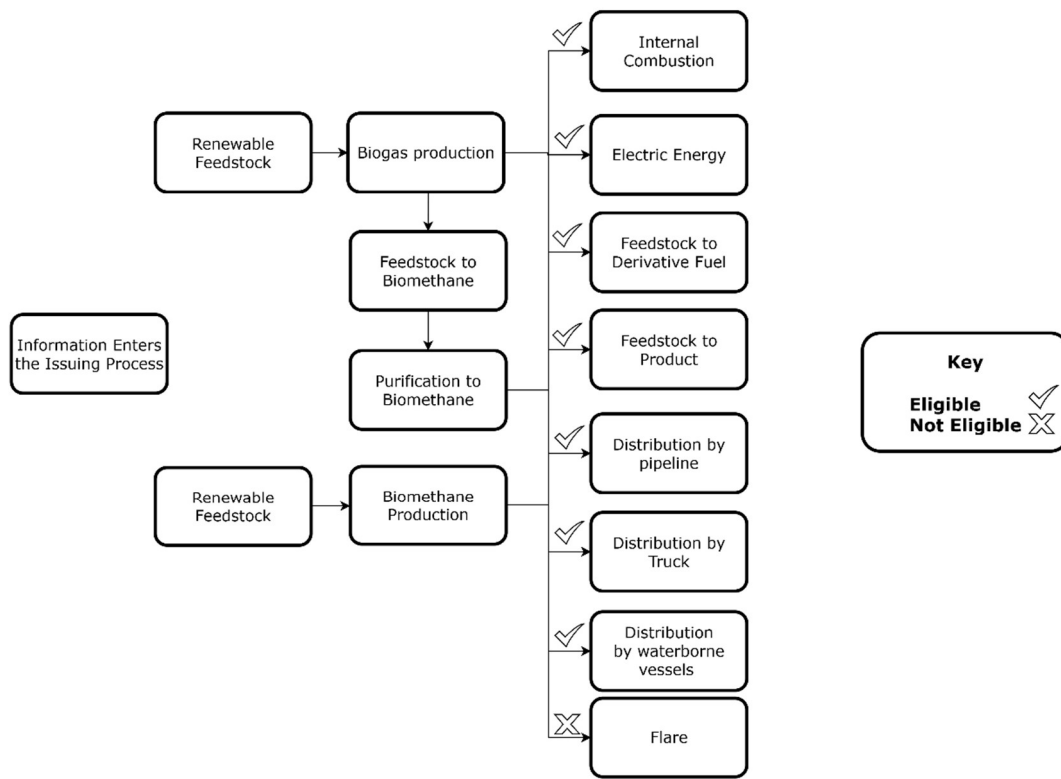


Figure 1: Gas Production Process

4.3.2 Multi-feedstock Production Facilities

It is possible to register a Production Facility using multiple feedstock types. A multi-feedstock facility can produce gas using more than one feedstock type only if each feedstock contributes more than 1% of the total annual production volume. Only gas produced from a renewable feedstock can be eligible for the Issuance of an I-TRACK(G).

Each certificate issued for a multi-feedstock Production Facility will reflect the mix of the feedstock and resource type or the individual production of each, depending on the country, laws, or issuers. The total number of certificates issued for a multi-feedstock Production Facility in a reporting period will be proportional to the output from that feedstock for the reporting period. This is true regardless of whether the Registrant requests the Issuance of certificates for each feedstock individually or a combination of feedstocks in the same certificate.

The Registrant must maintain supporting documentation related to the derivation of the proportion of energy output per feedstock for each reporting period, at the generation facility for a minimum of two years from the date of submission. The Issuer may require copies of such calculations and supporting documentation, which will be subject to audit by the Issuer, regulators, or their agents.

4.4 Eligibility for Historic Production

The Registrant will have a two-year window to issue I-TRACK(G) for eligible gas production. However, it is important to note that this timeframe may vary depending on the country or local legislation. For example, in the year 20XX, a Registrant will be able to request the Issuance of I-TRACK(G) for gas production that occurred in 20XX - 2.

4.5 Further Requirements

I-TRACK(G) will not be issued when another certificate (or similar instrument) currently exists with a claim to the same attributes (e.g., the same unit of Biomethane used to generate two different certificate types). This is fundamental in ensuring the avoidance of double counting of any rights to attributes included in an I-TRACK(G).

An I-TRACK(G) may exist sequentially with another attribute tracking methodology recording the same attributes for the same event or activity so that only one certificate has effect at any point in time.

In the case of a Production Facility with an approved carbon credit project, the Registrant will decide whether to retain or assign the rights to emission reductions. Such information shall be contained in the Production Facility registration and the I-TRACK(G).

In the case of a Production Facility whose production is approved for a jurisdictional emission reduction scheme, the Registrant must provide the information, and the local Issuer must ensure that such information is contained in the Production Facility registration and the I-TRACK(G).

Biogas or Biomethane produced in a Production Facility for electrical energy generation locally is only eligible for I-TRACK(G) Issuance using book and claim if the electrical energy is not and will not be certified as I-REC(E) or subject to any similar certification of environmental attributes related to electricity production.

Any portion of Biogas or Biomethane produced by a Production Facility and burned in flare or fugitive biogas/biomethane is not eligible for I-TRACK(G).

Registrants of renewable electricity facilities may request Issuance of I-REC(E) if I-TRACK(G) containing all environmental attributes have been redeemed on behalf of the facility in line with the I-TRACK Foundation pending interoperability guidance.

5. Principles

The I-TRACK(G) Product Code defines three sets of principles – Organisational, I-TRACK(G), and Infrastructure principles. Each is described in the following sections.

5.1 Organisational Principles

5.1.1 End Users' Right to Information

The owner or End User of any I-TRACK(G) has the right to obtain full information concerning the origin and attributes. This right is reflected within this Product Code and associated documents and ultimately evidenced through the provision of a unique Redemption Statement which is assigned to a Beneficiary or End User.

5.1.2 Collaboration

The Code Manager's primary objective is to enable Entities to make reliable and robust claims about the origin and nature of the gas they consume. Wherever possible, the Code Manager is to engage with governments and relevant Non-Governmental Organisations (NGOs) to implement the Service, ensuring open and fair access to the market for all.

All I-TRACK Foundation Accredited Entities are required to collaborate with other similar attribute tracking systems to help ensure that all such systems can provide full and accurate information for End Users to minimise the potential for double counting of attributes. The Code Manager structures and maintains their relationships with all Accredited Entities to ensure compliance with this principle.

Where information exists within the Code Manager's control, it shall, subject to applicable laws, be made available to the I-TRACK Foundation and relevant legal authorities without charge.

Where appropriate and practicable, Services may be integrated with, or connected to, other similar tracking systems, whether these are Accredited to the Standard or not.

The Code Manager commits to regular engagement with stakeholders wherever appropriate to help ensure that this Product Code remains consistent with evolving knowledge, technologies, and best practices. This may include education and training sessions for the I-TRACK(G), consultation on changes to this Product Code, and liaison with interested parties.

5.1.3 Independence

The Code Manager is independent of the markets they serve. They have no role in the production, distribution, consumption, or regulation of gases or other associated markets. The Code Manager shall not engage in any trade or exchange of I-TRACK(G) and shall only provide Services under published tariffs that are independent of the traded price of I-TRACK(G). The

Code Manager shall maintain confidentiality and not provide privileged or otherwise sensitive information to other parties.

Accredited Entities providing Services shall, unless otherwise required by legislation or approved by the I-TRACK Foundation, be contracted under restrictive agreements that prevent them from undertaking other Market Entity roles within the I-TRACK(G) market. Where required, appropriate provisions to prevent abuse of position and ensure equitable treatment of all parties shall be agreed with the I-TRACK Foundation and included in the relevant contracts.

Where any Accredited Entity wishes to assume 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 audit. Label approvals and ongoing multi-role operation are subject to continued compliance with these requirements.

5.1.4 Flexibility

The Code Manager recognises that technologies, markets, and laws are subject to evolution and change. Where appropriate, Services provided may accommodate flexibility in how compliance can be demonstrated.

Any provision not explicitly documented within this Product Code that might conflict with the Standard shall be referred to the I-TRACK Foundation before adoption.

5.1.5 Dispute Resolution

When disputes regarding the implementation of this Product Code arise, except where legislation or the contract requires otherwise, the Code Manager may appoint the I-TRACK Foundation to function as an independent arbiter, expert, or mediator.

5.1.6 Entry Barriers and Non-Discrimination

The Code Manager aims to enable wide and diverse access to the I-TRACK(G) Code. Participation in the I-TRACK(G) market is non-discriminatory and conditional only on appropriate due diligence processes and applicable legislation.

Where Services are chargeable, the fees shall be reflective of the Service provided and applied consistently to all Entities without bias. The Code Manager shall, to the extent that quality is not detrimentally impacted, cost-effectively provide Services.

All Accredited Entities providing Services reserve the right to require pre-payment for Services on a case-by-case basis without disclosure of the reasons for such requirement.

5.1.7 Accurate and Clear Communication

The Code Manager commits to ensuring that all communication is accurate and clearly presented. Wherever practicable, all public communications shall be made available on the Code Manager's website www.globalgastracking.com.br and on the I-TRACK Foundation's website: <https://www.trackingstandard.org/product-code/gas/>.

5.1.8 Promote Markets Where All Actors Have a Role

The Code Manager will provide Services openly and transparently and actively seek engagement not only with Market Entities but also with wider interest groups such as governments, NGOs, and End Users.

5.2 I-TRACK(G) Principles

5.2.1 Immutable Statement of Fact

An I-TRACK(G) is a statement of verified historical fact relating to one or more events or activities at a Production Facility. Information contained within an I-TRACK(G) at the time of Issue cannot be later amended, other than in exceptional circumstances where errors are detected in verified historical facts.

I-TRACK(G) cannot be issued for any future activity or events.

The eligibility of an I-TRACK(G) to be redeemed for a purpose may expire per the requirements of the Entity to which the Redemption is reported, or applicable law. It is the responsibility of the purchaser of an I-TRACK(G) to ensure the validity of the I-TRACK(G) under national legislation or for the intended purpose or reporting requirements.

Any attribute included within an I-TRACK(G) may not be later extracted for separate transfer. This means no attribute(s) included in an I-TRACK(G) can be claimed in another verified record of the same event or activity (see section 4.5 Further Requirements).

5.2.2 Uniqueness of I-TRACK(G)

An I-TRACK(G) is a unique statement representing the evidenced attributes associated with a specific event or activity during a specified period to avoid double counting for any unit of gas.

5.2.3 Possession and Ownership of an I-TRACK(G)

The clear and uninterrupted chain of custody (possession) of an I-TRACK(G) from producer to End User is fundamental. Records of possession of all I-TRACK(G) are recorded within the Registry and may be displayed on a Platform Accredited by the I-TRACK Foundation (see section 1.3.1 Chain of Custody for I-TRACK(G)).

An I-TRACK(G) shall always exist within an Account in the Registry.

5.2.4 Use of an I-TRACK(G) is Distinct

An I-TRACK(G) is considered used/retired/cancelled when it is redeemed and can only be redeemed once.

- A redeemed I-TRACK(G) ceases to be transferable to another Entity.
- The use of an I-TRACK(G) can only be verifiably assigned to an End User upon Redemption.
- The use of I-TRACK(G) for public statements of consumption can only be done upon Redemption.

5.2.5 Evidence-Based

An I-TRACK(G) can be issued only against independently verified evidence of a historical event or activity.

5.2.6 Labelling Schemes and Information Carrier Provision

Per the guidelines provided by the Code Manager, an I-TRACK(G) may be used to convey additional attributes such as applicable Labelling Schemes.

5.3 Infrastructure Principles

5.3.1 Operational Reliability

The Registry uses a bespoke general-purpose activity accounting engine based on the Code Manager's unique immutable data model. This provides secure storage and management of production data and attributes essential to a Registry's correct and trusted operation.

The Registry is continuously monitored and developed to ensure consistent and reliable operation.

5.3.2 Data Integrity and Security

The Registry is designed with referential integrity, full transaction logs, and double-entry bookkeeping protocols to ensure that data integrity is maintained within the Registry and in transfer with other Infrastructure.

Security protocols are implemented to prevent unauthorised access to records and the Registry codebase.

5.3.3 Cost Effectiveness

The Registry is designed to enable operation over low bandwidth internet connections and general use specification computer platforms requiring no additional paid-for software.

5.3.4 Accessibility

The Registry is accessible via the internet and maintained to be compatible with current versions of Microsoft Windows and macOS.

User interfaces are designed in line with best practices for such Infrastructure.

5.3.5 Confirmation of Compliance with the Standard

The Code Manager hereby asserts that they provide and operate the Service in compliance with the Standard and acknowledge the requirement to maintain alignment with the Standard to retain the Accreditation status for I-TRACK(G) and the associated Entities, Services, and Infrastructure.

6. Organisational Parties

6.1 Overview of Responsibilities

Figure 2 shows the relationships between the roles described in the Standard. The Code Manager has adopted this model as the basis for its Service.

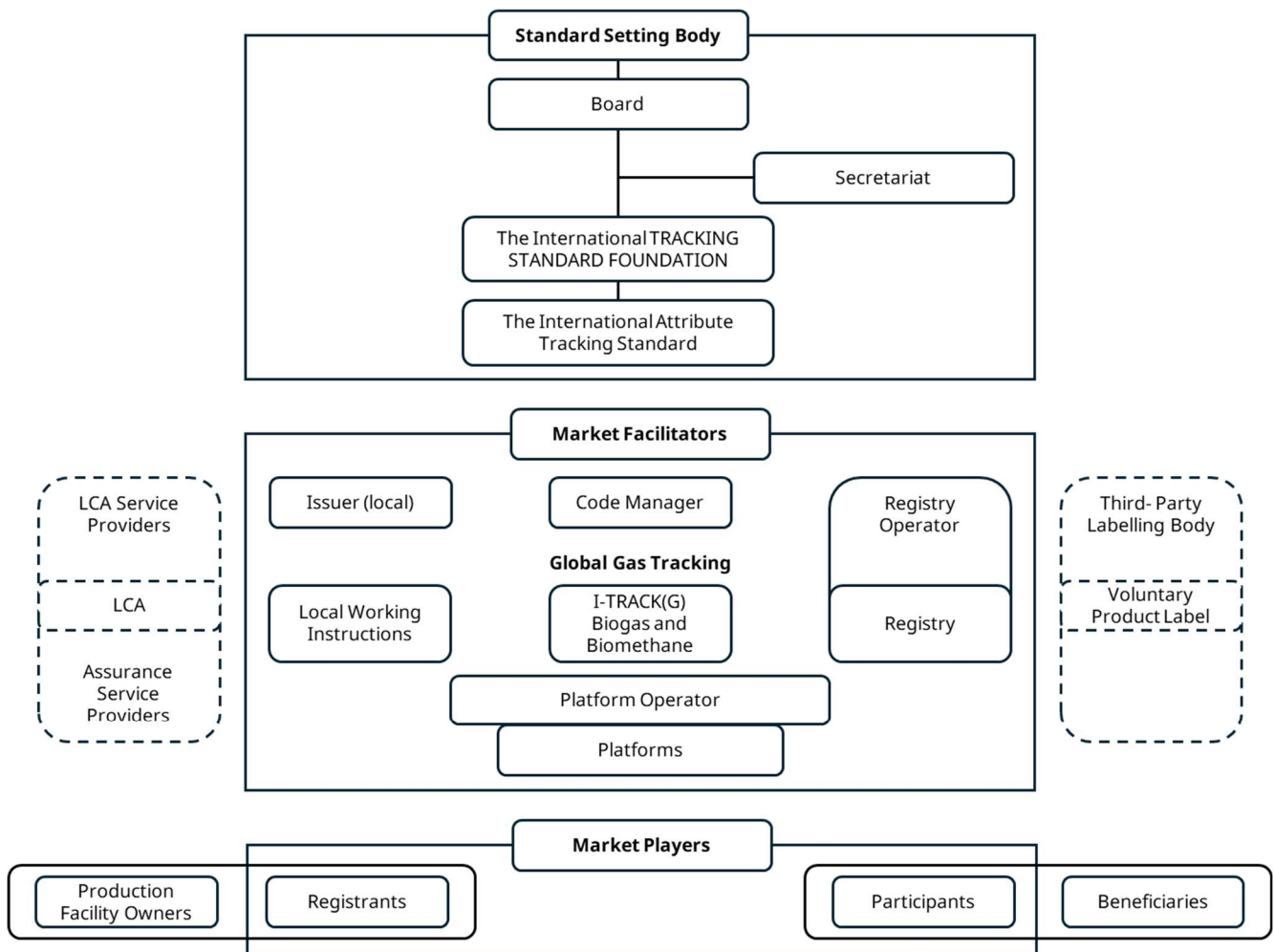


Figure 2: Structure of Roles

6.2 Code Manager

The Code Manager is responsible for delivering and ensuring the quality of the Service, including:

- in coordination with the I-TRACK Foundation, the appointment or commercial organization of Issuers, Registry Operators, Assurance Service Providers, and LCA Service Providers.
- maintenance of procedures and governance arrangements related to I-TRACK(G); and

- overall compliance with the Standard.

The Code Manager may not be a Participant, Registrant, Production Facility Owner, LCA Provider, or ASP for I-TRACK(G). The Code Manager must be Accredited by the I-TRACK Foundation.

6.3 Registry Operators

Evident, and Instituto Totum are authorised to function as Registry Operators by the Code Manager. Other Entities may apply to the Code Manager to become Registry Operators. Registry Operators must be Accredited by the I-TRACK Foundation.

Once Accredited, each Registry Operator:

- maintains an integrated Registry for its designated geographic area in which all relevant transactions are recorded; and
- is responsible for the delivery, accuracy and overall quality of that Registry.

All Registry Operators are required to coordinate and interact with other Registry Operators on all transactions and statistics.

Registry Operators may not be a Registrant, Participant, or Production Facility Owner.

6.4 Issuers

The Code Manager's Service is supported and delivered by multiple Accredited Issuers. An Issuer is an Entity that can be put forward by the Code Manager to the I-TRACK Foundation or by the I-TRACK Foundation to the Code Manager. In either scenario, the Issuer must be approved by the Code Manager and Accredited by the I-TRACK Foundation. Evident and Instituto Totum are approved to act, individually, as Issuers following Accreditation by the I-TRACK Foundation in any country in which the I-TRACK(G) product is available, except for those where another Issuer has been exclusively designated under relevant national legislation or otherwise defined by the I-TRACK Foundation.

Once Accredited, Issuers will:

- enter into an agreement with the Code Manager, relevant Registry Operator, and the I-TRACK Foundation;
- be bound by and uphold the I-TRACK(G) Product Code and the Standard; and
- be able to register Production Facilities and issue I-TRACK(G).

6.4.1 Issuer Service Provision

The Code Manager's Service involves several Issuers authorised to make certificate entries in the Registry. Issuers operate under a contract with the Code Manager, the applicable Registry Operator, and the I-TRACK Foundation with geographic restrictions on where they may provide Services.

An Issuer may not be a Participant, Registrant, or Production Facility Owner, and must always remain as an independent actor in the market.

6.4.2 Withdrawal of an Issuer

An Issuer can withdraw the provision of Services as a whole or for a geographic subregion of its Service.

The Code Manager and/or the I-TRACK Foundation may terminate or modify its agreement with an Issuer, withdrawing its authorisation to provide Services under this Product Code either as a whole or for a geographic subregion of its Service.

6.5 Registrants

Registrants are the owners of Production Facilities or Entities that act on their behalf and must register as a "Registrant" with the responsible I-TRACK(G) Issuer in their country. A Registrant is the only party that can register a Production Facility and make I-TRACK(G) Issue Requests with the (local) Issuer.

A Registrant may also be a Participant.

Where an organisation or individual wishes to register Production Facilities in more than one country, it may be necessary to apply to be a Registrant with more than one Issuer.

6.6 Participants

A Participant is a Market Entity, a trader, part of the chain of custody for Biogas or Biomethane, or a consumer with an Account in the Registry. Any legal person or organisation can be a Participant. Restrictions may be placed on Participants who are also Accredited Entities to ensure no potential conflict of roles and duties.

Participants can redeem certificates on their own behalf or on behalf of their clients (Beneficiaries) and can also trade certificates from their main Account to the main Account of another market participant.

A Participant may also be a Registrant.

Participants are required to sign a contract with the Registry Operator to gain access to the Registry.

6.7 Production Facility Owners

A Production Facility Owner is an Entity that owns a Production Facility which is eligible for registration under this Product Code.

6.8 Beneficiaries

Beneficiaries are the End Users of I-TRACK(G), which have been assigned as part of a Redemption Transaction.

Any Entity may also be a Beneficiary.

6.9 Life Cycle Assessment Service Providers

LCA Service Providers 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 or Registrants may contract directly with eligible providers. Furthermore, Issuers may define specific rules governing the acceptance and qualification of an LCA, ensuring alignment with the criteria set forth by the Code Manager and the I-TRACK Foundation.

LCA Service Providers must be third-party Entities approved by the Code Manager and independent of the Registrant, Production Facility Owner, and ASP. LCA Service Providers provide a report with carbon footprint or CI data to the Registrant or Production Facility Owner. Such reports shall be assured by an accredited ASP.

Where CI reporting regulations apply, the Code Manager must approve organisations that are subject to such regulations.

Prospective LCA Service Providers must seek approval from the Code Manager and show they have the knowledge and capabilities to uphold rigorous scientific and engineering standards. This includes, but is not limited to, maintaining licensed Professional Engineering staff or consultants.

The methodology used by the LCA Service Provider is considered a Label under the Standard and will be approved for use by the I-TRACK Foundation. In this case, the Labelling Authority is the owner of the methodology, but the LCA Service Provider can submit this methodology for usage.

6.10 Assurance Service Providers

An Assurance Service Provider (ASP) is an Entity which conducts validation, verification, and auditing of Facility registration data, Inspection Data, LCA studies or other relevant verification steps of the Biogas or Biomethane certification process. ASPs must be third-party Entities approved by the Code Manager and independent of the Registrant, Production Facility Owner, and LCA Service Provider.

The ASP shall provide a limited or reasonable Assurance Statement to the Registrant affirming that the LCA study conducted by the LCA Service Provider is without material errors and complies with the referenced methodology.

At the time of Production Facility 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. If there are changes that alter the characteristics of the Production Facility, it is up to the ASP to update its report to contemplate the new conditions for measuring the volume of gas.

Any Entity interested in becoming as an ASP must undergo a technical audit by the Code Manager, which will be reported to the I-TRACK Foundation.

The ASP is considered a Verification Authority, and their methodology is considered a Verification Label under the Standard. This will be approved for use by the I-TRACK Foundation in collaboration with the Issuer.

6.11 Labelling Authorities

A Labelling Authority is an Entity that imparts additional criteria beyond the scope of I-TRACK(G) Code but may be associated with I-TRACK(G).

Where a Labelling Authority has an agreement with the Code Manager, the applicable Registry Operator, and the I-TRACK Foundation, I-TRACK(G) may carry the Label if the Labelling Authority's additional criteria are met and if requested by an approved Registrant or Participant.

If a Labelling Authority needs to apply a Redemption Label, the Code Manager will establish protocols and propose such changes as may be required to this Product Code to accept this requirement.

6.12 Redemption Authorities

A Redemption Authority is an organisation responsible for developing and managing specific Labels to be applied at the time of retirement or redemption of an I-TRACK(G) such as a high-impact certification or similar. It is important to note that all retirements must be included in the Registry to maintain the quality of information and transparent processes.

A Redemption Authority, like others, must be approved by the Code Manager and the I-TRACK Foundation. After validation, it can advertise its certification, and additional information will be included in the final certificate.

6.13 Platform Operators

A Platform Operator is an Entity responsible for the provision and operation of a Platform that provides functions which extend the scope of a Registry. Platforms do not constitute a primary record of the custody of an I-TRACK(G) but may function as a custodian on behalf of Entities and hold details of legal title to an I-TRACK(G).

Platform Operators may have varied commercial relationships depending on the nature of their Platform.

Platform Operators must be approved by the Code Manager and the applicable Registry Operator and Accredited by the I-TRACK Foundation.

7. Processes

7.1 Completeness and Accuracy of Information

The submission of any required information for any requirement of this Product Code shall be complete, accurate, and legible. Partial, inaccurate, or illegible submissions may delay processing or invalidate a submission.

7.2 Additional Information

Accredited Entities may require additional information beyond that specified in this Product Code before assessing a complete submission. Any additional information shall be limited to what is considered necessary for the validation of required information or completion of the related request.

7.3 Registration of Market Entities

Before Accounts are created, Production Facility Registrations are processed, or I-TRACK(G) are issued, Market Entities must be registered and their status in the Registry must be Active.

Production Facility registration information and that relating to I-TRACK(G) Issuance received before a Market Entity is Active on the Registry will be marked as received on the day the Market Entity is activated.

7.4 General Data Protection Law

The General Data Protection Law established under Brazilian law applies to the Code Manager. Other countries have adopted similar data protection laws, and the requirements are accepted as general good practice, which Entities must follow as a minimum.

The nature of the Service requires that data potentially be transmitted between countries and other Accredited Registries, and all Entities agree to such transfer without limitation.

7.5 Access to Data

Accredited Entities may publish detailed data relating to Registrants, Production Facilities, Participants, Issuing, Redemption, and any other data held within the Registry, but shall not publish details of individual transactions or Beneficiaries unless authorised by the responsible Participant.

7.6 Overview of Key Processes

The I-TRACK(G) market is designed to enable simple and clear engagement for Registrants and Participants. An overview of the key processes is shown in Figure 3 below.

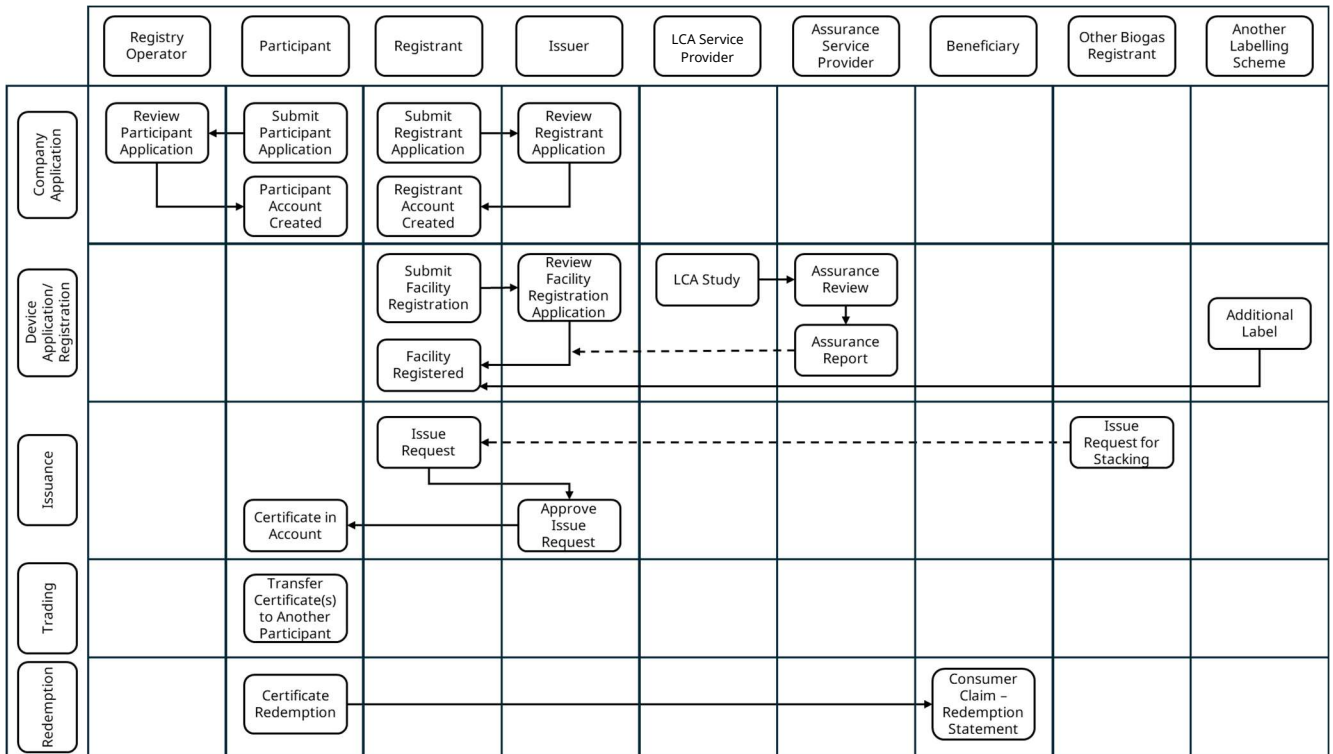


Figure 3: Lifecycle Overview

8. Market Entity Entry and Exit

8.1 Application Requirements

The applicant must be an organisation or individual with 'legal person' status (e.g., a registered incorporated or unincorporated business, public sector Entity, or private individual).

Entities wishing to function as a Registrant or Participant shall be required to agree to Standard Terms to ensure that no Entity benefits from a preferential position compared to another.

Variations to Standard Terms are not permitted without the explicit approval of the Code Manager and the I-TRACK Foundation. Compliance checks shall be performed for all applicants under the Standard Terms. The Registry Operator and Issuers shall always have the right to either refuse to enter or terminate with immediate effect agreements with Entities that have not satisfied their reasonable requirements for compliance with international best practices in commercial agreements and AML regulations.

8.1.1 Required Information

Applicants shall, as a minimum, be required to provide the information listed below.

- Role(s) requested under the application (e.g., Participant and/or Registrant).
- Applicant Legal Name (individual's name, if an applicant is an individual or business name if the applicant is a business).
- Registered office address.
- Core business activity.
- Year of formation or registration.
- Website URL.
- Approximate number of employees.
- Name of the Chief Executive Officer or General Manager.
- Legal Status (e.g., registered incorporated body, public sector Entity, or private individual).
- Countries of business activity.
- Country of company registration, tax domicile, or private residence.
- Shareholders and ultimate beneficial owners holding more than 10%.

- Corporate registration number or passport number.
- Balance sheet total for last fiscal year (with currency specified).
- Operational contact person name, e-mail, and telephone.
- Lead user contact person name, e-mail, and telephone.
- Finance contact person name, e-mail, and telephone.
- Details of related Entities.

The Issuer or the Registry Operator shall run all applicants through a robust KYC review process.

Other additional information may be added to this list and will be specified on the Issuer or Registry's website.

The application process for Registrants and Participants can be seen in Figures 4 and 5, respectively.

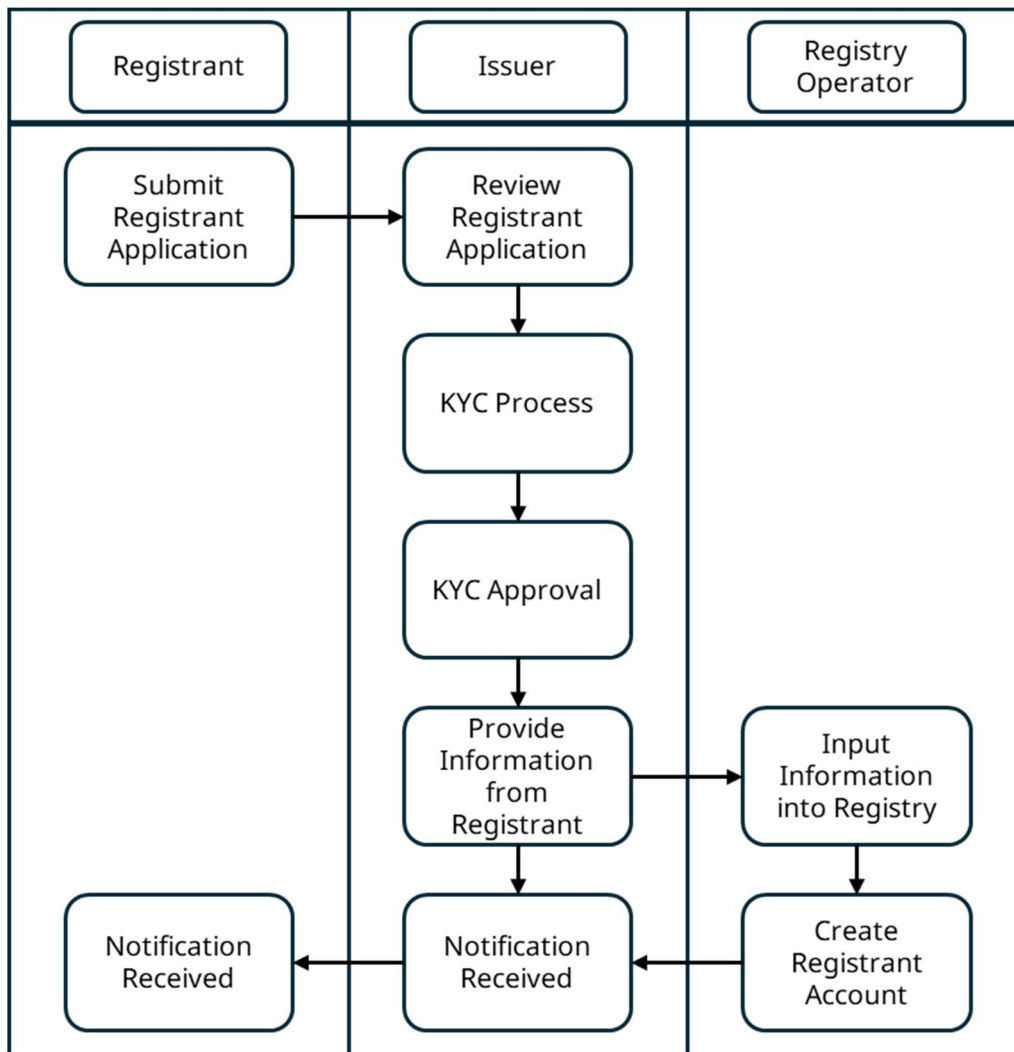


Figure 4: Registrant Application Process Overview

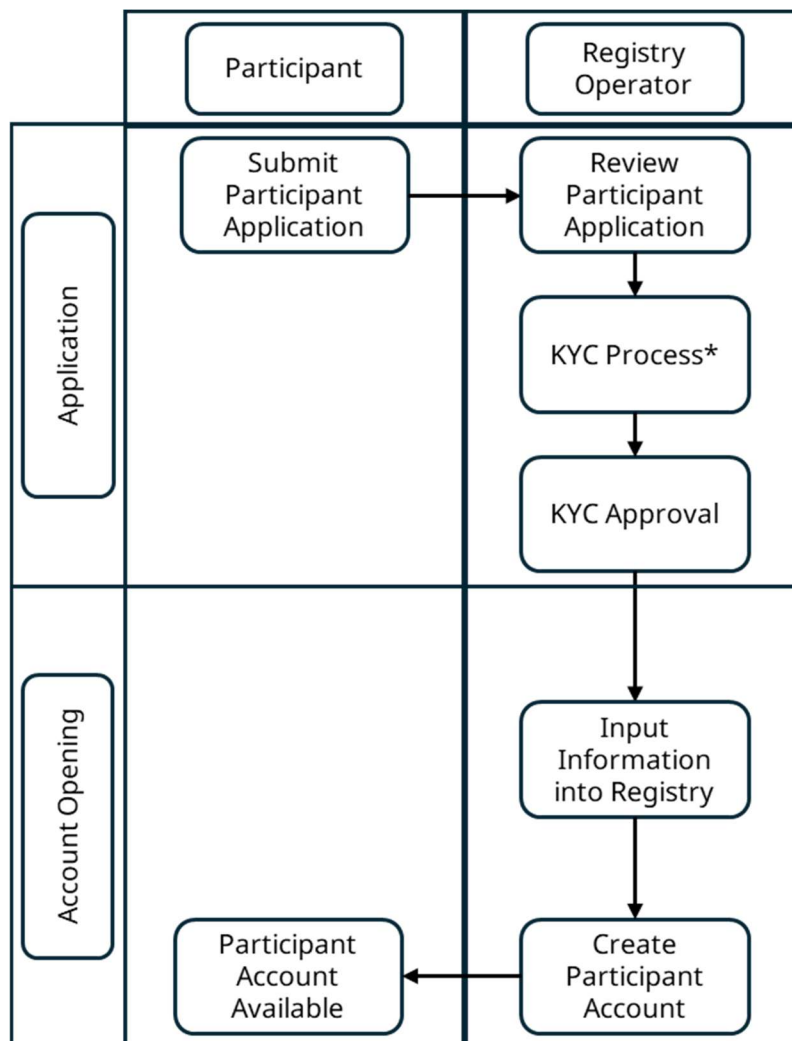


Figure 5: Participant Application Process Overview

8.1.2 Decision

When an application has been approved, the Registry Operator will enable appropriate access to the Registry. The Registry Operator will also advise the lead user of their User ID and initial credentials for gaining access to the Registry.

Once Registry access has been provided, Participants may create and manage Accounts in accordance with the guidelines provided by the Registry Operator.

Where the Issuer and/or the Registry Operator are unable to establish an acceptable credit rating for the applicant they may at their sole discretion require a deposit or prepayment for Services to be provided in accordance with any provisions that may exist within their respective Standard Terms.

Where the Issuer and/or the Registry Operator are unable to verify the identity of the applicant or has reasonable doubt of the good conduct of the applicant or has reasonable doubt of the authenticity of the evidence provided, they can refuse the application, per the requirements of

the Standard, and share the refusal decision and any provided information with other Accredited Entities.

A list of Registrants and Participants, and the Registry to which they have access, may be published on the Code Manager's website.

8.1.3 Suspension and Termination

In cases where a Market Entity is suspected to have acted fraudulently or committed any offence under the laws applicable to their places of domicile or trade or in respect to this Product Code or where a Market Entity is in default of contractual terms with an Accredited Entity, their access to Services may be permanently or temporarily withdrawn or withheld without notice. The Code Manager shall report the name of a Market Entity suspended or terminated with other Code Managers and the I-TRACK Foundation.

Registrants and Participants may terminate agreements with Issuers or the Registry Operator on notice and will only be eligible for a rebate for Services paid for but not received if explicitly provided for within the relevant Standard Terms.

Where an Accredited Entity terminates an agreement for reasons of default or non-compliance by a Market Entity, it shall have no obligation to re-contract with that Market Entity, and no other Accredited Entity shall be obligated to contract with that Market Entity.

If the Registry Operator is prevented from providing Services through either a legal requirement or through contractual default, all Issuers shall make all reasonable efforts to ensure that a replacement Registry Operator is appointed and that terms are offered to all impacted Market Entities within a period of three months.

8.2 Production Facility Registration

To have I-TRACK(G) issued, a Production Facility must first be registered in the Registry. Registration is initiated by a submission from a Registrant and administered by an Issuer duly authorised to act in the country which the Production Facility is located or, in exceptional circumstances, the country from which the connected gas network is managed where that is different.

The registration process may be commenced at any time but cannot be completed before the Production Facility is substantially complete in engineering terms and capable of Biogas or Biomethane generation.

Where an Entity wishes to register a Production Facility in a location that is not served by an Issuer, they may make representation to the Code Manager requesting the appointment of an Issuer.

A Production Facility can be registered with other tracking systems, but it must not receive more than one production attribute tracking certificate for any MMBtu. The Registrant must notify the Issuer of any changes to registrations with other tracking systems.

Registrants remain responsible for updating registration details for Production Facilities where any provided data changes during the period of registration.

8.2.1 Required Information

The supporting evidence must, as a minimum, include the information listed below:

- Unedited project photos (ideally with the Production Facility location embedded).
- Description of the Production Facility or related Production Facilities.
- Type of gas to be certified (biogas or biomethane).
- Sample metering evidence.
- A single-line gas diagram using industry-standard notation. This must show all existing network entry/exit points and any directly connected consumer supply points.
- Reports or certificates from laboratories that demonstrate the chemical composition of the Biogas and/or Biomethane produced and its lower calorific value. For conversions from other equivalent units to MMBtu, the factors listed in Appendix 1 shall be used.
- Presentation of evidence that the Biomethane production unit owns the Biogas or has contractual coverage for the Biogas used.
- Presentation of contracts or other evidence that demonstrates the destination of the Biogas or Biomethane produced from the production unit.
- Authorisation from government agencies to produce, if applicable.
- Production capacity data and production data from the last 24 months, if applicable.
- Proof that the Registrant is the owner of the associated energy attributes.
- A Certificate of Interconnection to a pipeline, distribution system, or other documentation demonstrating approval of a Production Facility to inject Biomethane into a common carrier network, where available.
- In situations where a Biogas producer sells Biogas to a separate Entity that will upgrade the Biogas to Biomethane, the Issuer must require that the contract between the Biogas producer and Biomethane producer specifies the ownership of environmental attributes between the parties. The Issuer must ensure both parties understand the language of the agreement and may take extra precautions to prevent double counting with specific care taken to address any unique circumstances.

The following points must also be considered when submitting the required information.

- The applicant must indicate on the application form whether a Production Facility is multi-feedstock.
- The Registrant may be required to nominate an ASP and indicate their selection as part of the application.
- Where a Production Facility is to be associated with a Production Facility Label, the Registrant shall provide evidence of the eligibility for the relevant Production Facility Label to be applied.
- A Registrant must be the Production Facility Owner or duly appointed by the Production Facility Owner. Proof of this status will be required. Such proof may be a copy of the legal ownership or an Owner's Declaration.
- In some instances, other documents such as contracts or proof of state ownership may be required.
- It is the Registrant's responsibility to satisfy the Issuer that the proposed registration is valid and that the output of the Production Facility is eligible for issuing of I-TRACK(G) certificates.

8.2.2 Carbon Intensity

I-TRACK(G) supports tracking one or more Carbon Pathways that provide Carbon Intensity (CI) tracking. While tracking CI is not mandatory, I-TRACK(G) encourages Registrants to submit and track CI whenever practicable. CI values are expressed in grams of carbon dioxide equivalent per megajoule of energy (gCO₂eq/MJ) as well as (gCO₂eq/Dth) or MMBtu (gCO₂eq/MMBtu) or MWh (gCO₂eq/MWh). I-TRACK(G) supports either a Full Lifecycle CI or a Partial Lifecycle CI (the applied methodology must always be cited as a reference).

- Full Lifecycle Carbon Intensity considers the GHG emissions associated with all the steps of producing, transporting, and consuming a fuel.
- Partial Lifecycle Carbon Intensity considers the GHG emissions associated with all the steps of producing a fuel up to the Injection Point or interconnection into the distribution system or interstate transportation system.

Lifecycle CI scores for Biogas or Biomethane require an assessment of all sources and sinks of GHG, from production to end-use, and these emissions must be divided by the energy in the gas at a specific point in that lifecycle. The resulting value is measured on a carbon dioxide equivalency basis. This feature allows I-TRACK(G) End Users to seek maximised GHG emission reductions.

Partial CI scores may be helpful for Registrants who have not identified a buyer (Beneficiary) before uploading the generation. A future Beneficiary may be able to use the CI provided to

calculate a full lifecycle analysis outside of I-TRACK(G). The alternative to using lifecycle accounting is to use source-based accounting like that used in voluntary, national, or jurisdictional-level GHG emission inventories.

Source-based accounting is simpler in that it focuses only on the GHG emitted at the point of end combustion of the gas and usually makes the assumption that all bio-derived fuels are “carbon neutral” (i.e., have zero net CO₂ emissions since CO₂ created at the point of combustion are offset by the uptake of CO₂ when the biological material that was the source of the Biogas or Biomethane was grown).

Using such a source-based methodology does not account for upstream methane effects (both reductions when the Biogas or Biomethane is created and leakage as the gas is transported to the end market). I-TRACK(G) does not require Production Facility owners to update the Carbon Pathways at specific intervals. However, if the production unit has a Label and the rules of that Label require updating the CI, it is the Registrant's responsibility to update the values at the frequency defined by the Entity responsible for the Label.

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

8.2.3 Verification

8.2.3.1 Initial Review

The Issuer will review the application to ensure:

- the Registrant is legally able to register a Production Facility on behalf of the Production Facility Owner;
- the Registrant is not suspected to have engaged in fraudulent activity in relation to gas certificates or financial transactions;
- the Production Facility is, in principle, eligible for I-TRACK(G);
- there is not an existing registration for the Production Facility; and
- the Production Facility is eligible for any notified Production Facility Label.

Where a publicly accessible government or regulatory gas Production Facility registration database contains sufficient information to verify the application, the Issuer may use this information. A published report of the characteristics of a Production Facility produced by a suitably accredited independent auditor may also be acceptable to the Issuer for verification.

8.2.3.2 Inspection

A site inspection will be required if the Issuer is unable to verify the application data. The Issuer may instruct an ASP, agreed with the Registrant, at the Registrant's expense, to conduct a third-party independent verification process. An on-site inspection report will be submitted to the Issuer. The ASP will arrange with the Registrant to conduct a site verification inspection. The Verification Agent will have a checklist stating the minimum verification requirements. This will normally include confirmation of the following information, in addition to what has already been defined in the Required Information section.

- The location of the Production Facility, both address and latitude and longitude.
- The sources/type of Production Facility (including photographic evidence).
- The capacity of the Production Facility.
- The nature and size of any on-site consumer loads.
- The location and class of metering equipment.
- The metering data records digital system.
- The connection to the pipeline if it exists.
- Any standby generators (e.g., for start-up) and whether they can directly contribute to the export of gas from the site.
- How and when the site takes gas from the network.
- The date of Production Facility commissioning.
- The quality of the produced Biogas, including its calorific value.
- The accuracy of the single-line diagram provided.

8.2.3.3 Final Review

The Issuer will review any provided inspection report to ensure that the application contains a true and accurate representation of the Production Facility.

The Issuer must verify any Labelling Scheme accreditations listed in the application with the responsible Labelling Authority. Labelling Schemes cannot be attached to a Production Facility registration without confirmation from the Labelling Authority. The Production Facility's status as shown on the website of the Labelling Authority is acceptable as confirmation.

The Issuer will check other known registries to ensure that the Production Facility is not likely to be receiving certificates from any other sources.

8.2.4 Registration

The Effective Registration Date shall be supported by verifiable evidence of the Production Facility characteristics on that date or earlier but no earlier than its Commissioning Date. Exceptions to this may be agreed upon at the Issuer's discretion.

Registration of a Production Facility shall expire five years from the Effective Registration Date unless the responsible Issuer specifies an earlier date. A Registrant may apply for renewal of registration in accordance with the general requirements for registration. Any registration renewal shall be assessed based on the requirements in place at the time of renewal.

If a material change occurs to an already registered Production Facility before the end of the five-year period, it is the Registrant's responsibility to notify the Issuer of the change, and the Issuer must update the Production Facility's registration data.

8.2.5 Production Facility Boundary and Traceability

The boundary of a Production Facility shall be determined by the Issuer in accordance with the principles set out below.

- In cases where there is a Biogas production plant and a Biomethane production plant, both plants can only be registered as a single Production Facility if both units are registered by a single Registrant and if 100% of the Biogas production is intended for the production of Biomethane (with or without flare). If part of the Biogas is destined for another destination or use, each production unit must be registered as a different Production Facility. If the owner of each production unit is different, each plant must be registered individually, except in cases where the owner of the Biomethane production unit has power of attorney (Owner's Declaration) from the owner of the Biogas production unit to act as a Registrant on their behalf; and
- The boundary shall normally be defined as the total or partial set of existing production units in a single connection to an internal use point or public gas pipeline or to a point of shipment of Biogas and/or Biomethane to be transported by any other means, including, but not limited to, road or rail; and
- It shall, where multiple points of connection to a public gas pipeline exist, be permitted only when evidence of contiguous ownership of gas or land assets that explicitly relate all production units within such contiguous ownership is provided; and
- It shall be capable of being controlled and dispatched either as a single unit or through a common generation control and dispatch system; and
- It shall have normally been planned at the time of first construction works as a single production project and, where capacity increases have occurred, these have been directly integrated with any pre-existing generation units inside the contiguous asset boundary; and

- It may, at the sole discretion of the Issuer, be considered as a single Production Facility where multiple production units have been placed under different ownership as part of a wider integrated project. Such cases shall be limited to projects where there is:
 - documented contiguous private ownership of gas or land assets that explicitly relate all generation units within such contiguous private ownership; and
 - pre-construction documentation to support the project was initiated with all generation units explicitly identified for potential development.

For the avoidance of doubt the additional clarifications are provided below.

- Common production control and dispatch do not create a boundary for a Production Facility where other constraints suggest limits within this.
- Common ownership does not create a boundary for a Production Facility where other constraints suggest limits within this.
- As specified in the Required Information, where multiple connections exist the Registrant shall still be required to submit a single line diagram that identifies every point of generation and consumption within the common gas connection between production units. The Issuer shall be notified of any change to the common gas connection and connections to it after the time of registration and may be subject to a further registration fee.

Conceptual Example:

The I-TRACK(G) Code seeks to provide a robust system for tracking the environmental attributes of Biogas and Biomethane, which covers all possible contractual relationships within the chain of custody.

If a Registrant has a Biogas production unit, whose output is directed entirely to a Biomethane production unit on the same property, the unit must be registered as a single Biomethane facility for I-TRACK(G).

However, if the units are owned by different owners (without a power of attorney between the parties) or if, even with the same ownership, part of the Biogas production is directed to another production unit (different from Biomethane), then the Issuer may require the Biogas production unit and the Biomethane production unit to register their Production Facilities without aggregation, that is, as two different Production Facilities: one for the Biogas production unit and the other for the Biomethane production unit.

If the Biomethane production unit wishes to certify its production with a possible level of traceability of segregation, it must acquire an I-TRACK(G) for Biogas from the connected unit.

If the Biomethane production unit acquires an I-TRACK certificate for Biogas from any other unit not physically connected, it may issue an I-TRACK certificate for Biomethane with a book and claim traceability level.

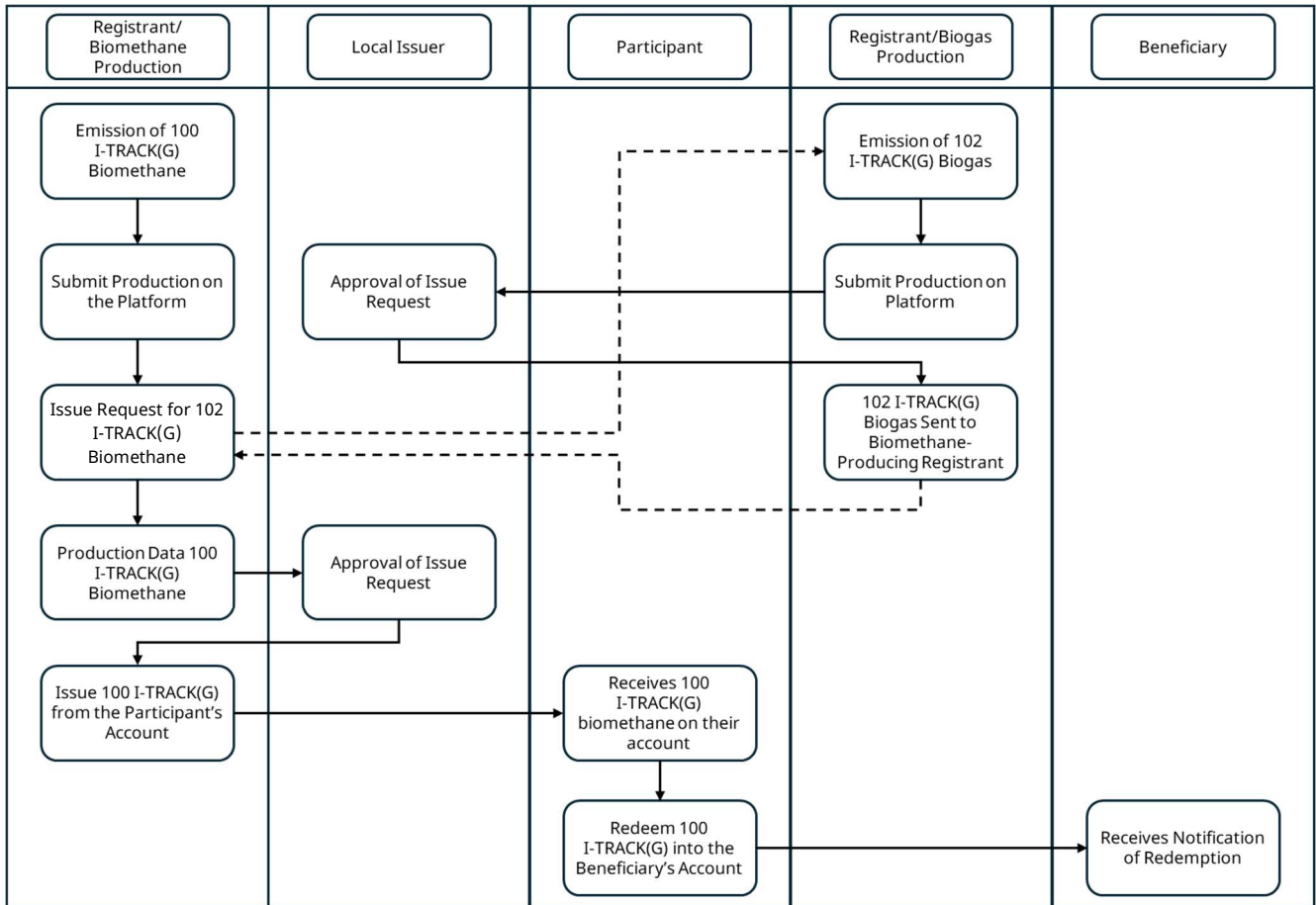


Figure 6: Workflow Example

8.2.6 Declaration

The Registrant's Declaration details the approved text to be signed by the Registrant in support of applications for Production Facility registration.

Where a Registrant is not the Production Facility Owner, the Production Facility Owner shall be required to submit a declaration confirming that the Registrant has the right to register the Production Facility. The Owner's Declaration details the approved text to be used for this.

8.3 Certificate Issuing

An I-TRACK(G) can only be issued against the provision of evidence of a production event which has occurred and is verified to be following this Product Code.

Measurement evidence for the output of a Production Facility for a Production Period must be gathered and validated by an independent party.

Production Facilities must provide information such as the application of Biogas or Biomethane and its use, the emission factor by burning the Biogas or Biomethane, and the origin of the Biogas or Biomethane. The LCA for GHG emissions shall be presented and assured by an assurance statement issued by the Assurance Service Provider.

The Issuer stores all documentation related to issued I-TRACK(G) in the Registry.

8.3.1 Certificate Data Fields

- Serial Number(s).
- Participant Account.
- Production Facility Feedstock Type.
- Production Facility Resource Type.
- Vintage Date.
- Production Facility Location.
- Quantity in MMBtu, expressed in lower calorific value.
- Eligibilities, if applicable.
- Carbon Intensity (CI), if applicable.
- Point of consumption, injection, or transport, if applicable.
- Whether other environmental attributes are separated and decoupled (e.g., carbon credits).
- Labels (e.g., eligibility flags or sustainability certifications).
- Country of Uptake, if applicable.
- Other information, as approved by the Local Issuer (e.g., quality of the gas, purity of the gas, chemical composition).

Note: If the beneficiary wishes to make any claim regarding the chain of custody, other than the point of consumption, injection, or transport, he must submit audited data regarding such claim for inclusion of the information in the certificate.

8.3.2 Eligible Production Periods

For a Production Period to be eligible for issuing it shall:

- be any duration equal to or less than two years, unless restricted by the requirements detailed in the Production Facility registration;

- be wholly within a single calendar year;
- not start earlier than the Effective Registration Date of the associated Production Facility's registration;
- not end later than the End Date of the associated Production Facility's registration;
- not include any period not specified within a valid Owner's Declaration for the associated Production Facility; and
- adhere to the requirements of the Issuance Deadline (below). Under the ISO chain of custody framework for book-and-claim systems, a functioning residual mix is essential to ensure that all attributes are accounted for and that no double counting occurs. This is because book-and-claim systems rely on the cancellation of certificates to transfer environmental attribute claims; any consumption not matched with timely certificate cancellations must default to a transparent, standardised mix.

For the avoidance of doubt, all Issue Requests shall be supported by evidence of gas production and an Issue Request for a Production Period occurring later than the date of submission shall be invalid.

Unless otherwise communicated, the Issuance Deadline is determined by looking two years into the past, considering the Production Facility registration date and Issue Request date.

8.4 Other Tracking Systems

Production Facilities using I-TRACK(G) should be aware of other tracking systems in the market with which I-TRACK(G) may compete. It is essential for Production Facilities to ensure the proper separation of data and reporting when dealing with multiple tracking systems.

8.4.1 Hierarchy of Evidence

This Product Code observes a hierarchy of evidence as ordered below.

1. For a Production Facility which is connected to a national, local, or private gas pipeline, the evidence should be gas market settlement metering data (e.g., pipeline statement or injection invoice).
2. Where such gas market settlement metering data is not available or where there is no connection to any gas pipeline, appropriate metering data which has not been through settlement validation may be accepted at the discretion of the Issuer.
3. Where gas market settlement metering data is not available, measured volume documentation for the periodic commercial/legal transfer from the Production Facility to another person/company may be accepted at the discretion of the Issuer.

4. If none of 1-3 is feasible, a system of measurement suggested by the Issuer and approved by the Code Manager should be used.

Unless prior approval has been granted by the Code Manager or Issuer, the Registrant must give the reason for using evidence in any category above. Approval of methods under 3 or 4 above will be granted only if all the following criteria are satisfied:

- A. The measured volume is agreed to by an independent auditor, Assurance Service Provider, or responsible technician.
- B. The measured volume cannot be claimed by another person/company.
- C. The measurement process is a reasonable representation of the volume produced by the Production Facility during the production period identified.

The measured volume should, where available, be provided to the nearest whole MMBtu.

The measured volume is determined as the active gas available for use by consumers whose consumption is not directly related to gas production at the Production Facility.

Where measurement data is not provided from a primary source, indirect evidence may be used in agreement with the Issuer.

8.4.2 Gas as a Feedstock

A company cannot register if it operates with gas storage for the treatment and transformation of gas into a by-product such as fertilisers. This type of operation must ensure the gas maintains the requisite attributes. Such companies shall redeem the I-TRACK(G) in the name of the company if they intend to use the certificates as proof of the feedstock origin.

8.4.3 Conversion

The standard unit for I-TRACK(G) certificates is MMBtu, based on the lower calorific value of biomethane. For conversions from other equivalent units to MMBtu, the factors listed in Appendix 1 shall be used.

For each Biogas Production Facility, a third-party audit may be required to assess the quality of the produced biogas and accurately measure the total biomethane content (in MMBtu or equivalent units) based on its lower calorific value. If a third-party audit is not feasible, a conservative standard or methodology approved by the GHG Protocol may be applied.

Additionally, local issuers may provide country-specific conversion tables and quality specifications according to national regulations.

8.4.4 Verification of Evidence

All evidence provided by Registrants in support of an Issue Request shall be independently verified. In most cases, verification of measured volume takes place within the gas settlement process and secure reports from this mechanism are deemed acceptable. In such instances, the settlement system operator is deemed to be the Production Auditor.

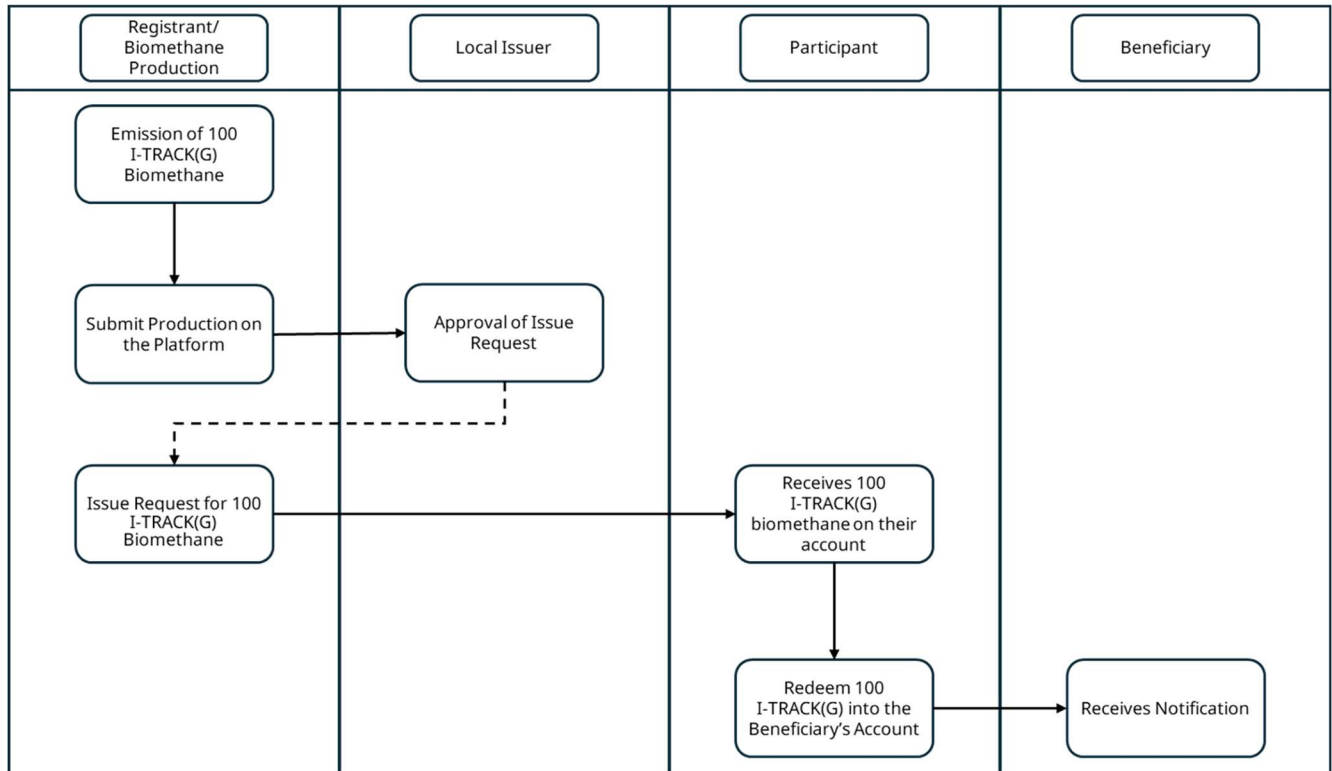


Figure 7: Issue Request Process Example

Where validated settlement data is not available, the Issuer may provide an alternative independent verification process. The Issuer may nominate an independent party to function as Production Auditor or Assurance Service Provider to independently verify production data.

At the time of Production Facility 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.

8.4.5 Self-Consumption of I-TRACK(G)

A Registrant requesting the Issue of an I-TRACK(G) for consumption within their business group should identify a Self-Consumption Redemption Account as the receiving Account on the Issue Request. This Self-Consumption Redemption Account may either be registered to the Registrant or the responsible Issuer.

Volume evidence for the consumption site must also be submitted with the Issue Request.

The Issuer must be satisfied that the following criteria have been met:

- the consumer and the Production Facility must each be at least 51% equity owned by a common holding company;
- the metering data evidence for the consumer has been independently verified to at least the standard of the production volume evidence; and
- the volume of I-TRACK(G) requested does not exceed the volume of consumption.

8.4.6 Indirect Evidence

Indirect evidence may be provided by an Approved Tracking Scheme (ATS). The precise details of the transfer will depend on the ATS and its exit procedures. However, there are general principles which must be followed. For issuing certificates, the Issuer can use the data from the ATS to convey that the appropriate number of I-TRACK(G) have been issued.

8.4.6.1 Conversion Request

An Issue Request must be submitted to the Issuer managing the interface with the relevant ATS. This Issue Request may be automated and will be defined in the interface protocols agreed for that ATS.

8.5 Certificate Ownership and Transfer

The Registry supports multiple classifications of Accounts with the flow of I-TRACK(G) between Account types shown in Figure 8.

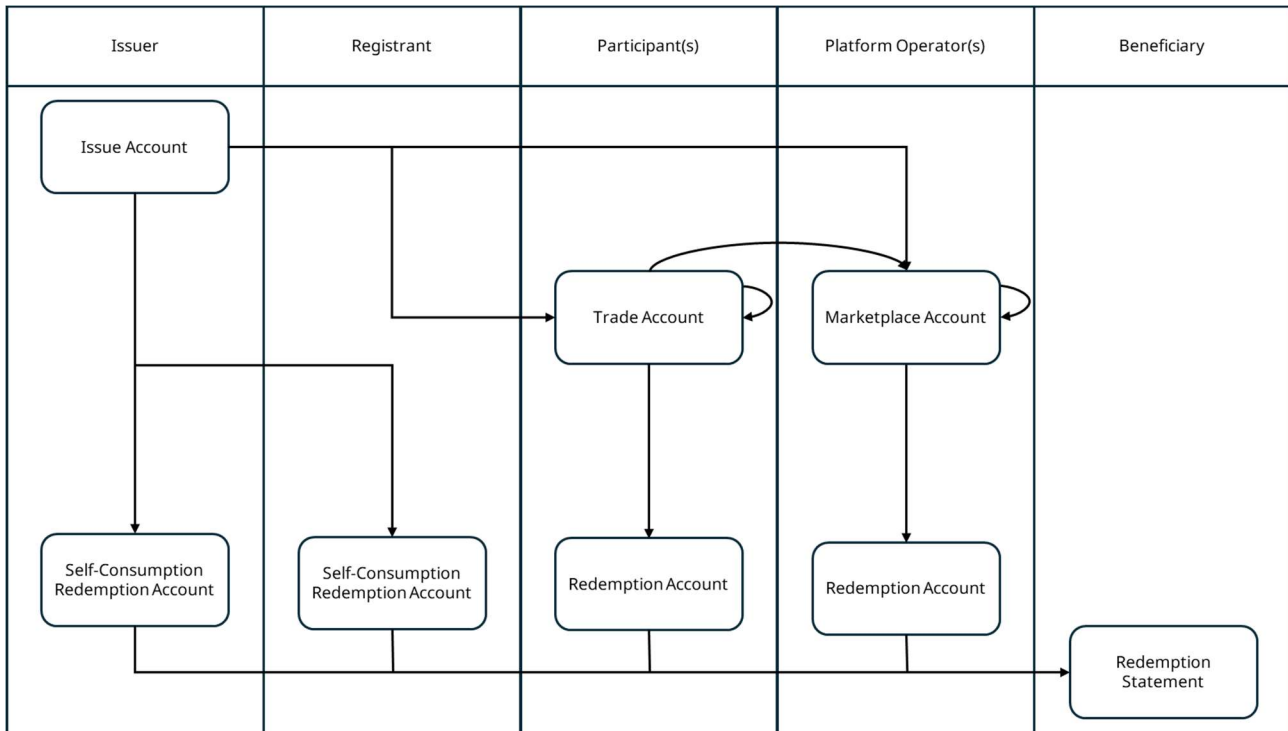


Figure 8: Certificate Ownership and Transfer Overview

8.5.1 Account Types

The available Account types are defined below.

- A **Trade Account** is an Account operated by a Participant which can be used to transfer and receive I-TRACK(G) certificates from or to another Account.
- A **Marketplace Account** is an Account operated by a Platform Operator which can be used to transfer and receive I-TRACK(G) from or to another Account.
- A **Redemption Account** is an Account operated by a Participant or Platform Operator which can only be used to receive I-TRACK(G) from another Account.
- A **Self-Consumption Redemption Account** is an Account operated by a Registrant, Issuer (on behalf of a Registrant), or Platform Operator which can be used to transfer I-TRACK(G) from another Account.
- An **Issuer Account** is an Account operated by an Issuer which can only be used to transfer I-TRACK(G) to another Account.

8.5.2 Ownership of Attribute Rights

Custodianship of I-TRACK(G) and the associated attribute rights is recorded in the Registry. Where an I-TRACK(G) is held within a Trade Account it is deemed to be owned by the Participant that owns that Trade Account.

Where an I-TRACK(G) is held within a Marketplace Account, the record of ownership shall be maintained by the relevant Platform Operator.

Where an I-TRACK(G) is held within a Redemption Account or a Self-Consumption Redemption Account, it is deemed to be owned by the Beneficiary recorded on the Redemption transaction.

Where a Retail Tariff is recorded as the Beneficiary, the gas supplier managing the Retail Tariff shall be responsible for allocating the I-TRACK(G) to its consumers. The purpose of this provision is to allow a gas supplier to offer a Retail Tariff to its consumers that is evidenced as a whole, avoiding the need to potentially redeem small volumes for thousands of consumers. The Code Manager reserves the right to require evidence of total consumption against any Retail Tariff to which I-TRACK(G) have been redeemed.

8.5.3 Carbon Offset

An I-TRACK(G) may not include the same attributes as a carbon offset certificate (e.g., those included within a Certified Emissions Reduction certificate, Verified Emissions Reduction certificate, or similar instrument).

Unless relevant legislation dictates otherwise, existing carbon offset rights must be explicitly included or not included on I-TRACK(G). Registrants shall confirm that they do or do not hold the right to any such avoided emissions, carbon offsets, or similar market instruments and irrevocably assign or not such rights on each issued I-TRACK(G).

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

8.6 Redemption and Assignment

Before any claim can be made, the I-TRACK(G) must be removed from a Trade Account and placed in a Redemption Account or a Self-Consumption Redemption Account, from which it cannot be transferred. This process is known as Redemption and is the only verifiable assignment of an I-TRACK(G) to an End User (Beneficiary). All Redemptions shall be recorded within the Registry.

As a statement of verified historical fact, an I-TRACK(G) is enduring and does not have an expiration date. The eligibility of an I-TRACK(G) to be Redeemed for a purpose may expire per the requirements of the Entity to which the Redemption is reported or any applicable law.

Upon Redemption, the responsible Participant shall record the Beneficiary, purpose of Redemption, location of related consumption, and Reporting Period relating to the Redemption. Once a Redemption has been processed, these details, such as the information from all Certificate Data Fields, may not be amended.

8.6.1 Redemption Statement

A Redemption Statement is a uniquely verifiable report confirming the Redemption and Assignment of I-TRACK(G) produced (or provided) by a Registry Operator.

8.6.2 Withdrawal

I-TRACK(G) owners can withdraw their I-TRACK(G) for any reason if they have not been transferred or redeemed. To withdraw an I-TRACK(G), the owner must pay a withdrawal fee.

8.7 Authorisation of Countries for Issuing

Issuing I-TRACK(G) is restricted to countries authorised by the I-TRACK Foundation.

The process of adding a new Issuance country for I-TRACK(G) is typically initiated by market players or stakeholders with knowledge of the respective national gas market. Prior to providing Services in any additional country, the Code Manager or any interested party must complete and submit a country report to the I-TRACK Foundation for authorisation.

8.7.1 Country Report

The purpose of a country report is to both justify the introduction of I-TRACK(G) in a particular country and determine and document any conditions that may be applied to the provision of Services within that country. A template for the minimum information that a country report should include will be available on the Code Manager's website.

Wherever possible, the Code Manager and the I-TRACK Foundation shall seek to engage with governments in the provision of Services. In order of preference, this shall include:

1. Government body acting as or appointing an Issuer under this Product Code,
2. Government body acting as or appointing an Issuer under a bespoke Product Code, Government acknowledgement of an appointed Issuer under this Product Code,
3. Government confirmation that there is no conflict for the provision of Services under this Product Code, and
4. no Government objection being received following notification to the appropriate Government of the intent to provide Services under this Product Code,

and in each case, Accredited to the Standard.

An I-TRACK(G) will not be issued where a government has instructed the I-TRACK Foundation or the Code Manager not to do so.

9. Additional Services

9.1 Procedural Standards

All Accredited Issuers operating under this Product Code shall document, follow, and maintain Local Working Instructions which shall be provided to the Code Manager for review.

In addition to the above, Local Working Instructions (LWIs) implemented by Issuers shall be made available for review by the I-TRACK Foundation.

9.2 Audit Review

The Service is predicated on trust in the provision of a reliable and robust traceability and reporting system. To maintain a quality service, all Accredited Entities operating under this Product Code will be subject to process audits on a periodic and ad-hoc basis. The audit reviews may involve a visit by the Code Manager and/or the I-TRACK Foundation to the offices of the Accredited Entity.

9.2.1 Initial Review

An Accredited Entity will be subject to an initial audit review by the Code Manager, normally no later than 13 months from commencing the provision of Services under this Product Code. This is a review by the Code Manager to ensure the Accredited Entity has implemented its procedures appropriately. It will normally involve a review of documentation and evidence.

9.2.2 Periodic Review

Periodic reviews will be conducted by the Code Manager approximately every two years following the initial review.

9.2.3 Ad-hoc Review

The Code Manager may request a review of an Accredited Entity at any time. Such a review does not necessarily require or imply deficient performance by the Accredited Entity involved. The ad-hoc review will follow the same requirements as the periodic review but may be specifically targeted if required by the Code Manager.

9.2.4 External Review

The quality of the Service is monitored through independent verification by the I-TRACK Foundation and other parties appointed by the Code Manager. This includes but is not limited to:

- assessment of Issuers as part of their accreditation process;

- periodic control audits of Issuers;
- initial and periodic review of Production Facility registration;
- independent validation of production data;
- registry monitoring;
- independent assessment of change requests;
- liaison with other tracking systems; and
- liaison with national and international anti-fraud and anti-money laundering authorities.

The I-TRACK Foundation is entitled to periodically audit Accredited Entities.

9.3 On-site Inspections

In addition to any verification inspection conducted during the registration or issue request processes, the Issuer, a Verification Agent, or the Code Manager may conduct an unannounced control and auditing visit to the premises of the Registrant, Production Facility Owner, or Production Facility.

The scope of such visits will be confined to verification of the data submitted in support of the Production Facility registration and associated issuing. Unreasonable withholding of access to the relevant premises or documentation will result in the immediate suspension of issuing for that Production Facility.

Where, for reasons of safety or security, a Registrant reasonably requires additional notice of a requirement for access to the relevant premises or documentation, a notice period of not more than one Business Week may, at the sole discretion of the Entity requesting the inspection, be accepted.

9.4 Complaint Management

Any Entity or group of Entities may submit a complaint to the Code Manager. The Code Manager will review all received complaints and determine, acting reasonably, the most appropriate process for resolution.

9.5 Error Management

An I-TRACK(G) shall not be deleted or altered except for the correction of an error. Where it becomes clear that an I-TRACK(G) has been issued in error, it may be subject to withdrawal by the Code Manager or, if this is not practicable, other remedial action may be taken by the Code Manager to preserve the integrity of the Service. Where the Code Manager becomes aware that the provenance of an I-TRACK(G) is suspect, it may suspend the I-TRACK(G) from Transfer or Redemption until any required investigation has concluded. The Code Manager may amend the

details of an I-TRACK(G) or take other appropriate remedial action when it has been confirmed that such an error exists. I-TRACK(G) may not be subject to amendment or withdrawal after Redemption other than by agreement with the respective Participant.

9.6 Change Management

All changes to this Product Code shall be subject to approval by the Code Manager. A register of change requests will be published on the Code Manager's website. Proposed changes are considered in the first instance by the Code Manager and may be referred to the I-TRACK Foundation for their opinion.

Change requests approved by the Code Manager shall be submitted to the I-TRACK Foundation for review and confirmation. Where the I-TRACK Foundation confirms a submitted change request, it will be implemented.

Rejected change requests may be referred by the proposer to the I-TRACK Foundation for review of the Code Manager's decision to reject and the I-TRACK Foundation may recommend adoption by the Code Manager.

9.6.1 Categories of Change Requests

9.6.1.1 Housekeeping Change Request

A change request which has no material impact on the rights and obligations of Accredited Entities, Market Entities, or their contracted parties, may be classified as a 'housekeeping change' by the Code Manager. Such changes may arise from clear errors, or they may represent minor administrative changes.

9.6.1.2 Emergency Change Request

These changes are exceptional and are essential to remain in legal compliance. Therefore, short timescales may be necessary to ensure that a reliable service is maintained.

Emergency change requests may be implemented without advance referral to the I-TRACK Foundation, but the I-TRACK Foundation must be notified immediately.

9.6.1.3 Ordinary Change Request

One that is not classified under either of the two previous classifications.

9.7 Support for Platforms

The Registry is designed to enable other Entities to provide services to customers both outside the scope or in place of existing Registry functionality.

All Infrastructure connected with the Registry must be approved by the Code Manager and any connection is subject to agreement with the Code Manager.

All Platforms connected with the Registry must be Accredited to the Standard.

9.7.1 Marketplaces

Where a Platform provides the functionality to transfer or Redeem I-TRACK(G) (such Platform being known as a “Marketplace”), any I-TRACK(G) placed onto that Marketplace shall be transferred into a Marketplace Account held by the Platform Operator in the Registry.

The Platform Operator shall maintain an auditable record of all transactions on its Marketplace, including details of any Entity that takes ownership or title of I-TRACK(G) placed onto that Marketplace.

Where I-TRACK(G) are Redeemed on a Marketplace for an Entity not being a Market Entity, they shall be Redeemed into a Redemption Account held by the Platform Operator in the Registry.

9.7.2 Data Collection Infrastructure

For the avoidance of doubt, Infrastructure that provides functionality not present within the Registry with the exclusive purpose of collecting data from Production Facilities is not classified as a Platform and there is no requirement for such Infrastructure to be Accredited.

Such Infrastructure may be subject to technical review at the discretion of the Code Manager prior to approval for connection to the Registry.

9.7.3 Market Entity Infrastructure

Market Entities may implement their Infrastructure as extensions to the Registry.

For clarity, a Market Entity’s Infrastructure that is not capable of being used to provide any functionality to third parties other than the viewing of Redemptions or reports relating to Redemptions is not classified as a Platform and there is no requirement for such Infrastructure to be Accredited.

Appendix 1: Standard Conversion Units

The global trading unit for I-TRACK(G) is MMBtu (Million British Thermal Units), based on the low calorific value (LCV) of biomethane. Standard conversion factors from other equivalent units are provided in the following table.

	MMBtu	Dth	MWh	GJ	Nm³
MMBtu	1	1	0.293	1.055	27.766
Dth	1	1	0.293	1.055	27.766
MWh	3.412	3.412	1	3.6	94.741
GJ	0.9478	0.9478	0.278	1	26.317
Nm³	0.036	0.036	0.011	0.038	1

Note: Nm³(Normal Cubic Meter) - unit of gas quantity representing the amount of gas that occupies one cubic meter at reference conditions: 0°C (273.15 K) and 1 atmosphere (101.325 kPa) of pressure.



GLOBAL GAS TRACKING

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