

March 01, 2006

Joint Implementation Supervisory Committee (JISC)

UNFCCC Secretariat
Martin Luther King Strasse 8
P.O.Box 260124
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Germany

Attention: Ms Daniela Stovcheva

Dear Ms Stovcheva,

On behalf of the International Emission Trading Association (IETA), I would like to make a contribution to the next meeting. In particular we would like to provide input to your discussion on the PDD & the Early Movers.

1. Early Movers

During COP7 in Marrakech the Parties to the UNFCCC agreed on “Guidelines for the implementation of article 6 of the Kyoto Protocol” (JI Guidelines) and recommended their adoption by the COP/MOP. In Montreal this recommendation was adopted in the same manner as the procedures of the CDM EB have been adopted. In the same decision the Parties agreed that “...projects starting as of the year 2000 may be eligible as Article 6 project if they meet the requirements of the guidelines....”

A significant number of JI projects have been developed and all of the projects have been made available for comments through the Climate L list by Operational Entities on their respective websites. At the same time projects have been developed in line with both two Annex I countries and their interpretation of the Marrakech Accord and, as such, there should not be a great difference between the JISC interpretation of the Annex B and that of the Operational Entities.

Finally as the JISC will, like the CDM EB, have to rely very much on the bottom up approach it will be essential that those that have taken the initiative to implement JI Project before the ratification and the installation of the Supervisory Committee are not penalised for their early action, in particular, in the situation where it is clearly demonstrated that real measurable emission reductions can be achieved with these projects.



2. PDD format

Following our earlier Letter of the 26th January we would like to reiterate the importance that the Committee provides guidance on the process after the PDD template has been approved. The following issues will have to be clarified:

- Will projects have re-write their PDDs that have been validated before the publication of the approved PDD
- In the event that the new PDD format has to be used, will projects also have to republish their PDDs and undergo a new validation?

IETA would like to suggest that those projects that have already been validated will not be required to resubmit their PDDs using the new format as this will bring additional cost for the project developers as well as not contributing fundamentally to the overall implementation and efficiency of the project.

As mentioned at the start of this letter we only hope to raise your awareness and some of the concerns within the Business community and trust that these points may help your forthcoming meetings. In the meantime we would like to wish you a successful first meeting.

Andrei Marcu
President