



Joint Implementation Supervisory Committee (JISC)  
UNFCCC Secretariat  
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Attention: Ms Daniela Stoycheva, Chair of the JISC

**SUBJECT: Contribution to call for public input to the Joint Implementation Supervisory Committee on guidance on criteria for baseline setting and monitoring**

On behalf of Climate Action Network Europe we would like to respond to your call for input on guidance on criteria for guidance on criteria for baseline setting and monitoring for JI Projects.

We would like to express our appreciation for the opportunity to submit our views on the important work that the Joint Implementation Supervisory Committee (JISC) is undertaking developing under Joint Implementation.

We have found the draft criteria for baseline setting and monitoring well written and a sound basis for further development. We are of the opinion that additionality should be ensured in every JI project and that maximum environmental benefits are crucial. We have noted that a set of criteria encourages transparency of the baseline setting and monitoring plans, as well as conservativeness in the baseline calculation and assessment. However, we would like to draw your attention to the following issues:

1. The need for clarity about simplification of the tool for the demonstration and assessment of additionality. Para. 2.b) (iii) Annex I, refers to a 'tool for the demonstration and assessment of additionality', approved by the CDM Executive Board. In order to ensure that the 'tool' will not be simplified excessively to the extent that its transparency is diminished, we encourage JISC to clarify which elements and at what stage of the 'tool' shall remain.
2. The need for further clarification regarding 'a comparable project' referred in para 2.b) (iv) Annex I. Guidance should be provided by JISC regarding which circumstances a positively determined project might be considered to be "comparable" with the project at hand. This is crucial to ensure detail justification of the relevance of the projects.
3. The need for clarification of methodology for calculation and adjustments of the leakage, referred to in para. 2.b) (ii) Annex II. To ensure the transparency and accuracy of the calculation of leakage we recommend indicating that not only data sources for the assessment of the leakage of the GHG from the project, referred to in para. 2 and para. 6, Annex II, is provided; but also clear methodologies on how the leakage has been calculated should be supplied.
4. As far as emissions factors are concerned we would like to urge JISC to define the meaning of 'reasonableness' in the context of application of emissions factors, referred to in para. 6. Annex II. Moreover, we would encourage the use of emission factors based on the latest reviewed and approved national communication of the host country.

We would be happy to provide further clarifications, respond to questions and/or provide additional input if it is deemed useful to Members of the JISC.

Sincerely,

On behalf of Climate Action Network – Europe

Ruta Bubniene  
Policy Officer