

Joint Implementation Supervisory
Committee (JISC)

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Berlin	2 August 2006	

Subject: Call for public input on guidance for baseline setting and monitoring

Dear JISC,

With regard to your call for input on the working paper “JI Guidance on Criteria for Baseline setting and monitoring”, I am pleased to send you the input from Global Carbon B.V., a developer of JI projects.

First of all I would like to express my gratitude to the JISC for their progress in establishing the JI mechanism. We, as project developer working mainly in JI, feel a great need to have certainty which criteria a JI project should meet. The possibility to obtain an international stamp of approval through JITrack 2, is essential to give sufficient comfort to the market.

The working paper is in our opinion clear in most aspects of baseline setting and monitoring. We do have however the following suggestions.

Paragraph 1

In this paragraph Appendix B of the annex to decision 9/CMP.1 is defined as the “JI guidelines”. However the definition should refer to decision 9/CMP.1 as a whole and not to decision 9/CMP.1 Appendix B only.

Paragraph 9 (a) (iii)

The indicated percentage should relate to the impact the source has on the emission *reductions*. In the following example this is further explained.

	Source 1	Source 2	Total
Baseline scenario	1	100	101
Project scenario	0	99	99
Reductions	1	1	2

Source 1 is not significant in both the baseline and project scenario. However, it has a significant impact on the reductions and should therefore be included in the project boundary.

Furthermore we would suggest to use 1% as the threshold as has been common practise in many JI projects and guidelines¹ and no absolute threshold.

Annex 1, paragraph 2 (a) (iii)

In case the simplified CDM Additionality Tool is used, we would suggest that, if a project developer applies step 1 and step 2 and/or step 3 of this tool, the application of the simplified CDM Additionality Tool is considered to be appropriate as mentioned in this paragraph.

Sincerely yours,

Lennard de Klerk
Director

¹ “Operational Guidelines for Project Design Documents of Joint Implementation Projects”, Version 2.3