



**Your information**

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<i>Experience in JI (brief summary, no more than three sentences)</i>	<i>JI-related experience since 2002, including consultancy and project management at three carbon funds: Finnish Carbon Procurement Programme (Finnder), Multilateral Carbon Credit Fund (MCCF) and Baltic Sea Region Testing Ground Facility (TGF, as well as participation in UNFCCC negotiations on JI in 2005 in Nairobi.</i>

*Please provide your input on the second draft determination and verification manual (DVM), which can be found on the call page.*

**Input (1): General remarks (optional)**

*Introduction and definition of the concept of materiality to avoid excessive focus on minor issues that have insignificant (define insignificant) impact on the project's emission reduction calculations*

*Inclusion of elaboration, explanations and examples into the DVM, for example as an annex, bearing in mind that the DVM can also facilitate the preparation of high-quality PDDs. Examples could include reference to relevant ISO standards, BAT documents and other recognised, standardised sources.*

*Allow use of versions of methodologies, tools and PDD templates that are valid at the time of launching the determination (i.e. at the time of publishing the PDD at the JI website for the first time).*

*Determinations can take years due to internal bottlenecks at IEs over which the project developer has no control. The requirement to revise the PDD every time there is a new version available will introduce unreasonable uncertainty into the JI cycle in terms of timeline and cost.*

*The manual should increase the security of justice and predictability of determination and verification outcome for the project participants, especially in this system where appellation instances do not exist and the verdict of AIE and/or JISC is final. In order to achieve better security of justice for the project participants, the manual should have clear definitions and guidance of acceptable approaches. The manual should also honour the internationally recognized legal principles of not applying new rules or regulations retrospectively and not to have a reverse burden of proof anywhere. Transparency and clarity in JI would also make it a viable option for a project based mechanism in the future, also for new countries that currently operate under CDM rules and could help to increase the number of projects.*

**Input (2): Input on the second draft DVM (It is not necessary to fill out all sections.)**

Section	Proposed change to the draft text (and reason, as appropriate)
A. BACKGROUND	
B. OBJECTIVES	
C. DEFINITIONS	
D. PRINCIPLES OF DETERMINATION AND VERIFICATION	Introduction and definition of the concept of materiality to avoid excessive focus on minor issues that have insignificant (define insignificant) impact on the project's emission reduction calculations
E. DETERMINATION	
1. General	
2. Publication of project design document	<p>Para 15 (a): Allow use of the PDD template version that was valid at the time of launching the determination, i.e. when publishing the PDD for comments at the JI website. Determinations have taken several years due to internal bottlenecks at IEs over which the project developer has no control. The requirement to revise the PDD every time there is a new version available will introduce unreasonable uncertainty into the JI cycle in terms of timeline and cost. In international law, the principle is that new rules or regulations should not be applied retrospectively, and this principle should be honoured in JI too.</p> <p>Para 15 (d) Define clearly what type of translation is acceptable. The definition should be such that it does not increase the bureaucratic burden and thus cause further delays for the JI cycle, bearing in mind the differing bureaucratic processes of obtaining “official” translations of different host Parties.</p> <p>Para 15 (e) It should be explicitly stated how additionality can be demonstrated without disclosing, or at least publishing all confidential business information. In this also, utilizing previously approved approached, and not imposing new requirements when the actual additionality requirements have not been changed, should be the preferred option.</p>
3. Project approval by Parties involved	
4. Project participants authorization by Parties involved	
5. Project boundary	
6. Leakage	Para 21 (a) Define “appropriately”
7. Baseline setting	
JI specific approach	Para 24 (a) (i)-(vii) Guidance on how to treat stated/planned vs. reality; examples of the

	<p>type of data and approaches that could be used.</p> <p>Provision to readily utilise previously approved approaches from comparable JI projects.</p>
Approved CDM methodology approach	Explicitly allow use of methodology versions that were valid at the time of launching determination (i.e. publication of PDD for comments through the JI website)
Multi-project emission factor	<p>Para 27 (b) What is meant by “significantly” and “reasonable degree of accuracy”, elaborate e.g. through examples and quantified definitions</p> <p>Provide elaboration and guidance on the multi-project emission factor approach, such as a database of standard emission factors etc. This could also be done separately from the DVM.</p>
8. Additionality	Para 29 (a) Allow use of version that was valid at the time of launching determination (i.e. publication of the PDD through the JI website)
9. Crediting period	
10. Monitoring	
JI specific approach	Para 35 (b) Define “recognized sources” and “reasonable confidence levels”
Approved CDM methodology approach	Explicitly allow use of methodology versions that were valid at the time of launching determination (i.e. publication of PDD for comments through the JI website)
Overlapping monitoring period	
11. Estimation/calculation of emission reductions or enhancements of removals	
12. Environmental impacts	
13. Stakeholder consultation	
14. Determination regarding small-scale projects (additional/alternative elements for assessment)	<p>Clarify that it is possible for a project that meets small-scale criteria to decide to be presented as a large-scale project, if they wish to do so.</p> <p>Provide guidance on how to treat small-scale projects in case the small-scale threshold is exceeded.</p> <p>Explicitly allow use of methodology versions that were valid at the time of launching determination (i.e. publication of PDD for comments through the JI website)</p>
15. Determination regarding land use, land-use change and forestry projects (additional/alternative elements for assessment)	
16. Determination regarding projects under programme of activities	<i>&lt;To be developed once the JISC adopts the definitions, forms, guidelines and</i>

	<i>procedures of programmes of activities.&gt;</i>
17. Determination report	
F. VERIFICATION	
1. General	
2. Publication of monitoring report	Provide a Monitoring Report template. Para 68 (c) Define clearly what type of translation is acceptable.
3. Project implementation	
4. Compliance with monitoring plan	
5. Revision of monitoring plan	Allow revision of monitoring report and adjustments to the PDD during verification in case the project implementation differs from the project design envisaged in the PDD, provided that the implemented project reasonably maintains the nature, technology, type and scale described in the PDD and provided that these deviations do not affect the project's baseline. (this may first require further guidance by the JISC, to be included in the DVM once decided by JISC)
6. Data management	
7. Verification report	
G. REFERENCES	
H. ABBREVIATIONS	
ANNEX: Determination and verification checklist	

**Please submit the form through the call web page.**