

INPUT TO DETERMINATION AND VERIFICATION MANUAL (SECOND DRAFT)



Your information

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Name (first name - family name)	Joint Implementation Action Group
Affiliation	The Joint Implementation Action Group (JIAG) is a consortium of carbon market pioneers that constantly interacts with policymakers and interest groups to communicate its views.
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Experience in JI (brief summary, no more than three sentences)	The members of the JIAG represent an aggregated JI project portfolio with over 116 million ERUs up to 2012 or 1/3 of the JI market in terms of credits and projects. This note has been developed with the support of representatives from the following companies: Global Carbon (chair), Lennard de Klerk (deklerk@global-carbon.com) Climate Focus (secretariat), Charlotte Streck (c.streck@climatefocus.com), Jelmer Hoogzaad (j.hoogzaad@climatefocus.com) Core Carbon Group, Morten Prehn Sorensen (mprehn@corecarbongroup.com) Camco International, Charles Purshouse (Charles.Purshouse@camcoglobal.com) Vertis Environmental Finance, James Atkins (james.atkins@vertisfinance.com) Carbon Trade & Finance, Ingo Ramming (ingo.ramming@carbontradefinance.com) Future Camp, Roland Geres (Roland.Geres@future-camp.de) Greenstream, Jussi Nykänen (Jussi.Nykanen@greenstream.net)

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)

<Please provide your comments of cross-cutting nature regarding the contents of the second draft DVM, if any.>

The Joint Implementation Action Group appreciates the opportunity to share its views on the initiative to develop a DVM for Joint Implementation ("JI") projects. The views expressed in this note are based on the unique JI experience of the JIAG members.

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	
E. DETERMINATION	
1. General	The DVM does not include specific procedures for projects that are transferred from Track 1 to Track 2. These projects may have undergone determination and received host country approval already. The JIAG proposes to add language on how Track 1 history would allow a shortened the Track 2 procedure.
Publication of project design document	
3. Project approval by Parties involved	
4. Project participants authorization by Parties involved	
5. Project boundary	
6. Leakage	
7. Baseline setting	
JI specific approach	Deviations to CDM methodologies
	In the current draft procedures for deviations are included for baseline setting and monitoring but not for additionality. It should be extended to the additionality approach as well.
Approved CDM methodology approach	Methodology version
	Project participants may choose to apply an approved CDM methodology. The AIE will have to verify that the appropriate version of the methodology has been used. The JIAG proposes that this assessment is based on confirming that the version used was indeed valid at the moment the PDD was made public at the website of the JIAG (www.ji.unfccc.int). If the validity of the methodology expires during validation, there should be no need to adjust the PDD.
	The JIAG proposes rephrasing paragraph 25 (a), 29a, 36 (a) 45b and 51a-i as

	follows:
	"The PDD provide the title, reference number and version of the approved CDM methodology used (if applicable). The AIE should confirm that the version used was indeed valid at the moment the PDD was made public at the website of the JIAG (www.ji.unfccc.int)."
Multi-project emission factor	
8. Additionality	
9. Crediting period	
10. Monitoring	
JI specific approach	Monitoring report template
	The JIAG suggests developing a standard monitoring report template which provides guidance on the structure of monitoring reports while accommodating the variety in project types.
Approved CDM methodology approach	
Overlapping monitoring period	
11. Estimation/calculation of emission reductions or enhancements of removals	
12. Environmental impacts	
13. Stakeholder consultation	Stakeholder consultation
	JI rules and procedures do not require a local stakeholder consultation, unless the Host Country requires otherwise. Therefore the JIAG suggests changing article 44 into:
	"The AIE shall assess, if required by Host Country rules, whether the PDD provides:"
14. Determination regarding small-scale projects (additional/alternative elements for assessment)	
15. Determination regarding land use, land-use change and forestry projects (additional/alternative elements for assessment)	

16. Determination regarding projects under programme of activities	<to activities.="" adopts="" and="" be="" definitions,="" developed="" forms,="" guidelines="" jisc="" of="" once="" procedures="" programmes="" the=""></to>
17. Determination report	Internal review
	JIAG does not see the necessity to make an explicit reference to the internal technical review in paragraph 61 as such requirement is already part of the accreditation procedure.
	Site visit
	In the current version of the DVM paragraph 61 a site visit is both obligatory for a determination and verification. This strict requirement will raise the transaction costs considerable while in some cases it is not a necessity (e.g. for period verification following an initial verification. We propose to leave the necessity of the site visit up to the profession judgment of the AIE.
F. VERIFICATION	
1. General	
2. Publication of monitoring report	
3. Project implementation	
4. Compliance with monitoring plan	
5. Revision of monitoring plan	
6. Data management	
7. Verification report	
G. REFERENCES	
H. ABBREVIATIONS	
ANNEX: Determination and verification checklist	