

July 25, 2008

Mr. Georg Børsting
Chair
Joint Implementation Supervisory Committee

Mr. Derrick Oderson
Vice-Chair
Joint Implementation Supervisory Committee

c/o UNFCCC Secretariat
Sustainable Development Mechanisms Programme (SDM)
P.O. Box 260 124
D-53153 Bonn, Germany

Ref: **Call for public input on JI PDD forms (incl. guidelines for users)**

Honorable Members of the Joint Implementation Supervisory Committee,

We would like to express our appreciation for the opportunity to submit our views on the need to revise the JI Project Design Document (PDD) forms (incl. guidelines for users).

Based on the experience with JI activities gained by the World Bank's Carbon Finance Unit, we find that the need to revise the JI PDD forms should be viewed in a larger perspective, focusing on the removal of barriers that are currently limiting activities under JI "Track 2".

We believe that the transparency and efficiency of the JI "Track 2" procedure¹ could be enhanced through full recognition of the nature and specific features of JI and by a constructive interaction of its three main driving elements. This would involve:

- Active involvement of, and sharing of responsibilities between, the key regulators involved in the interpretation and application of the JI procedure, namely the Designated Focal Points (DPFs), the Joint Implementation Supervisory Committee (JISC) and the Accredited Independent Entities (AIEs);
- Proper recognition of the capacity of countries with JI projects to ensure environmental integrity of JI "Track 2" activities and emission reductions under their respective Kyoto emission targets, having established a full set of compliance tools and met all JI eligibility requirements as per the Decision 9/CMP.1;

¹ JI "Track 2" procedure is the verification procedure under the Joint Implementation Supervisory Committee (JISC) specified in paragraphs 30-45 of the *JI Guidelines* determined in the Annex of decision 9/CMP.1.

- Appropriate interpretation, implementation and application of the JI guidelines set out in Decision 9/CMP.1 and in relevant JISC decisions to be followed by the AIEs and project proponents.

We also believe that such constructive interaction should be the basis for any further guidance on the JI “Track 2” procedure as well as for a review of the JI PDD forms (incl. guidelines for users).

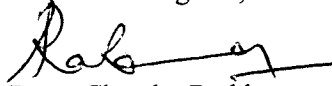
In this regard, we would like to suggest establishing a dedicated working group comprising representatives of the DFPs, JISC, AIEs and the UNFCCC Secretariat; this working group should develop a draft of a JI Validation & Verification Manual bearing in mind the nature and specific features of JI. This work could, for example, draw upon the existing *JI Determination Guidelines* in the *Validation & Verification Manual* developed by IETA/PCF in 2004².

We welcome the organization of the fifth UNFCCC JI Technical Workshop and believe that this forum can be used to further discuss terms of reference for the suggested working group and to collect input from a larger set of stakeholders on this matter (e.g. project proponents, NGOs, IGOs).

The World Bank Carbon Finance Unit would appreciate the opportunity to actively contribute to this discussion.

We would be happy to respond to questions and/or provide additional input if this is useful to Members of the JISC.

With kind regards,



Rama Chandra Reddy

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Carbon Finance Unit, The World Bank

² IETA/PCF (2004), *JI Determination Guidelines*, Part Four of the “Validation and Verification Manual”, Version 3.3, <http://www.ieta.org/ieta/www/pages/download.php?docID=259>.