



INPUT TO THE SECOND DRAFT ON  
PROCEDURES FOR PROGRAMMES OF ACTIVITIES  
UNDER THE VERIFICATION PROCEDURE UNDER THE  
JOINT IMPLEMENTATION SUPERVISORY COMMITTEE



**Your information**

<i>Name (first name - family name)</i>	<i>Joint Implementation Action Group</i>
<i>Affiliation</i>	<i>The Joint Implementation Action Group (JIAG) is a consortium of carbon market pioneers that constantly interacts with policy-makers and interest groups to communicate its views.</i>
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<i>Experience in JI (brief summary, no more than three sentences)</i>	<i>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:</i>  <i>Global Carbon (chair), Lennard de Klerk (deklerk@global-carbon.com)</i> <i>Climate Focus (secretariat), Charlotte Streck (c.streck@climatefocus.com), Jelmer Hoogzaad (j.hoogzaad@climatefocus.com)</i> <i>Core Carbon Group, Morten Prehn Sorensen (mprehn@corecarbongroup.com)</i> <i>Camco International, Charles Purshouse (Charles.Purshouse@camcoglobal.com)</i> <i>Vertis Environmental Finance, James Atkins (james.atkins@vertisfinance.com)</i> <i>Carbon Trade &amp; Finance, Ingo Ramming (ingo.ramming@carbontradefinance.com)</i> <i>Future Camp, Roland Geres (Roland.Geres@future-camp.de)</i> <i>Greenstream, Jussi Nykanen (Jussi.Nykanen@greenstream.net)</i>

*Please provide your input on the second draft procedures for programmes of activities under the verification procedure under the Joint Implementation Supervisory Committee, 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 second draft on procedures for programmes of activities under the verification procedure under the Joint Implementation Supervisory Committee (JISC). The views expressed in this note are based on the unique JI experience of the JIAG members.

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

Section	Proposed change to the draft text (and reason, as appropriate)
1. Definitions	
2. General principles	<p>Starting date</p> <p>In paragraph 17 the JIAG suggests to have the starting date as of 2000. This would bring JI PoA in line with JI guidelines and procedures.</p>
3. Preparation of JI programmes of activities	<p>Inclusion of JPA</p> <p>Similar to regular JI projects, JIAG considers the role of JISC in the JI PoA cycle important at two moments being</p> <ul style="list-style-type: none"> <li>a) to approve the JI PoA (i.e. making the determination final) and</li> <li>b) during approving of the reduction (i.e. making the verification final).</li> </ul> <p>In the current draft JI PoA procedures, the JISC is also involved in JPA inclusion proposed by the Coordinating Entity (CE). However, JISC involvement in this process is not necessary and the JIAG proposes to remove par 36 – 41 of the draft PoA procedures.</p> <p>To structure the involvement of the Host Party in the JPA inclusion process, we can propose that the DFP will be requested to state in the PoA LoA whether it requires the CE to obtain a separate LoAs for each JPA the CE wants to include or that the DFP does not require such individual JPA LoA at all.</p>
4. Determination referred to in paragraph 33 of the JI guidelines	<p>Additionality</p> <p>JIAG supports that it is up to the CE to decide on which level (JI PoA or JPA) additionality is to be proven. However the proposed methods to demonstrate additionality are unnecessarily stricter than the additionality guidance for regular JI. Furthermore the three methods refer to a policy only whereas the definition in par 6 refers to a policy and goal. We propose to remove the three bullets listed under 20 (j) (i). To ensure equality between regular JI and PoA JI, reference to relevant annex in the Guidance for Criteria for Baseline Setting and Monitoring should be included instead.</p>

5. Submission of additional JPAs	<p>Review of an inclusion</p> <p>Similar to paragraph 30, request for review of an inclusion in paragraph should be issued by at least three JISC members.</p>
6. Determination referred to in paragraph 37 of the JI guidelines	<p>Overlap of monitoring periods</p> <p>In paragraph 46 the procedures define that ‘The monitoring period covered in each verification report of a JI PoA shall not overlap with previous monitoring periods.’</p> <p>Dependent on the frequency of e.g. regular meter readings some overlaps of monitoring periods between different JPAs are not avoidable in some cases from our experiences. In the case of billing processes that are common e.g. for natural gas suppliers there will be overlaps because data from some participants are not available until the deadline of the monitoring report. They must be accounted for in the next monitoring period even if the monitoring period from this JPA might overlap with the period of other JPAs in that case. Therefore we would suggest cancelling paragraph 46.</p> <p>Sampling methods</p> <p>Sampling methods should be described in the JI PoA-DD as much as possible. If the CE decides to use a sampling method that has not been discussed in the monitoring plan of the JI PoA-DD then it is up to the CE to agree with the AIE to ensure the proper monitoring and verification. To simplify the procedures we would suggest cancelling paragraph 51 -55. The Host Party and/or JISC could always request a review at the final verification stage.</p>
7. Fees	

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