Call for public inputs on the draft "Guidance on criteria for baseline setting and monitoring" July 2011

Public inputs are solicited on the draft "Guidance on criteria for baseline setting and monitoring", in particular, regarding the following issues:

(a) Whether and how comparable cases should be defined in the context of a JI specific approach already taken in comparable cases;

No. This is likely to be a very case-specific issue and can best be left to the AIEs to verify based on their professional judgment.

(b) Whether the de minimis rules should be used to define the project boundary and estimating leakage and how such rules should relate to the concept of JI; and

No. This is likely to be a very case-specific issue and can best be left to the AIEs to verify based on their professional judgment.

(c) Whether the concept of prior consideration of JI should apply under the Track 2 procedure.

No. We agree with the suggestion that the eligibility of any project started from 1 Jan 2000 should be the prerogative of the host Party. It would be useful for this to be explicitly stated.

In our view, the proposed specific changes and comments on the draft 'guidance on criteria for baseline setting and monitoring' are balanced. We would accept the Guidance, with the following notes:

(Para 10) The grace period for the use of methodologies should be aligned with the grace period used under the CDM, 8 months.

CMIA is an international trade association representing companies that finance, invest in, and provide enabling support to activities that reduce emissions. CMIA's membership accounts for an estimated 75 per cent of the global carbon market, valued at USD 120 billion in 2010. Solely representing organisations that provide services to and invest in the environmental sector, membership does not include any entities with compliance obligations under cap-and-trade schemes. This results in a unique advocacy platform with emphasis on the environmental integrity of market mechanisms and climate change policies.

CMIA contact information:

Miles Austin
Director, CMIA
miles.austin@cmia.net

Steven Gray
Chair of the FMIA working group, CMIA
SGray@c-c-capital.com