



## JI DETERMINATION REVIEW FORM (F-JI-DR)

(By submitting this form, a Party involved in the project (through the designated focal point) or a JISC member may request a review in accordance with paragraph 35 of the JI guidelines.)

Party involved (designated focal point) / JISC member submitting this form

Title and reference number of the proposed JI project

Rehabilitation of Dolna Arda Hydropower Cascade, Bulgaria

### R e q u e s t   f o r   r e v i e w

#### Please provide reasons in support of the request for review and attach supporting documentation.

(The requirements of Article 6 of the Kyoto Protocol and the JI guidelines and further relevant requirements defined by the COP/MOP or the JISC with regard to determinations pursuant to paragraph 33 of the JI guidelines have to be met and appropriately dealt with by the AIE. Requirements defined in paragraphs 31, 33 and 34 of the JI guidelines are listed below. Please indicate which requirements of Article 6 of the Kyoto Protocol or the JI guidelines or further relevant requirements might not be met and/or dealt with appropriately by the AIE and may therefore require review. Please provide explanations, as appropriate.)

- According to paragraph 31 of the JI guidelines project participants shall submit to an accredited independent entity a project design document that contains all information needed for the determination of whether the project
    - Has been approved by the Parties involved;

**NO** Would result in a reduction of anthropogenic emissions by sources or an enhancement of anthropogenic removals by sinks that is additional to any that would otherwise occur;

    - Has an appropriate baseline and monitoring plan in accordance with the criteria set out in appendix B of the JI guidelines.
  - According to paragraph 33 of the JI guidelines the accredited independent entity shall determine whether:
    - The project has been approved by the Parties involved;
    - The project would result in a reduction of anthropogenic emissions by sources or an enhancement of anthropogenic removals by sinks that is additional to any that would otherwise occur;

**NO** The project has an appropriate baseline and monitoring plan in accordance with the criteria set out in appendix B of the JI guidelines;

    - Project participants have submitted to the accredited independent entity documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts, in accordance with procedures as determined by the host Party, and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party.
  - According to paragraph 34 of the JI guidelines the accredited independent entity shall make its determination publicly available through the secretariat, together with an explanation of its reasons, including a summary of comments received and a report of how due account was taken of these.
  - Other requirements that may require review.
- There is no evidence of the financial additionality.
- Furthermore this project according to the baseline study will have a side effect which is reflected in an increase of electricity consumption for pump storage power plants. This issue is not covered neither is additional consumption deducted from the envisaged project output.
  - It is clear from the document how a new unit can increase installed power, however it is not clear how it can increase the overall electricity production from the same water balance
  - The Monitoring Plan is not taking into account the affect of unit 5 on units 1-4 electricity production considering that the water supply is the same