



Jl DETERMINATION REVIEW FORM (F-Jl-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 Jl guidelines.)

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

Title and reference number of the proposed Jl 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 Jl guidelines and further relevant requirements defined by the COP/MOP or the JISC with regard to determinations pursuant to paragraph 33 of the Jl guidelines have to be met and appropriately dealt with by the AIE. Requirements defined in paragraphs 31, 33 and 34 of the Jl guidelines are listed below. Please indicate which requirements of Article 6 of the Kyoto Protocol or the Jl 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 Jl 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 Jl guidelines.
- According to paragraph 33 of the Jl 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;
 - The project has an appropriate baseline and monitoring plan in accordance with the criteria set out in appendix B of the Jl 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 Jl 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.

Explanation:

According to the documents contained in the PDD and annexes about the project's additionality, this is based on financial barriers. Particularly restrictions to access to the financial resources to finance the project under reasonable conditions of rates, amount, periods.

This is a very reasonable argument to prove additionality, but there is no financial analysis or documentation that could give certainty on the arguments described on the PDD.

The Determination report did not address the additionality issue and does not provide any additional information or interviews with the purpose to solve this critical aspect, and arrive at the final conclusion given the limited amount of information provided in the PDD.

All the mentioned above is a critical for the Jl projects, for that reasons it is necessary to request a review in order to ensure compliance with one of the main requirement to qualify as a Jl project under track 2.