



### 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

CMM utilisation on the coal mine Shcheglovskaya-Glubokaya of the State Holding Joint-Stock (0077)

#### 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;
  - 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.

The approved consolidated methodology ACM0008 / Version 03 "Consolidated baseline methodology for coal bed methane and coal mine methane capture and use for power (electrical or motive) and heat and/or destruction by flaring" was used to identify the baseline scenario of the JI project. It requires that the latest version of the CDM additionality tool is used to demonstrate additionality. However project proponent used version 3 (valid from 16 Feb 2007 until 29 Nov 2007) of "Tool for the demonstration and assessment of additionality" instead of version 5.2. It is also against JISC rules and guidance which requires that "*In case an approved clean development mechanism (CDM) baseline and monitoring methodology is used, all explanations, descriptions and analyses, inter alia with regard to additionality, shall be made in accordance with the selected methodology.*"

Additionally according to paragraph 20 and 21 of JISC *Guidance on criteria for baseline setting and monitoring* version 1 *If an approved CDM baseline and monitoring methodology is used, all explanations, descriptions and analyses shall be made in accordance with the selected methodology.* However the project proponent did not apply the "Tool to determine project emissions from flaring gases containing methane" as required by ACM0008, version 03 and instead used its own assumptions.

Hence, the issues were not appropriately addressed by provisionally acting AIE.

Furthermore there are inconsistencies with regard to starting date of the project, version of the PDD used for the determination, description of the project within determination report.