

31 July 2007

Ms. Fatou Gaye
Chair of Joint Implementation Supervisory Committee
UNFCCC Secretariat
Martin Luther King Strasse 8
D-53153
Germany

Dear Chair,

I write to you on behalf of the International Emission Trading Association (IETA) in response to the JISC's call for public input on possible topics related to the work of the JISC (e.g. further elaboration of the guidance on criteria for baseline setting and monitoring) to be included in the discussions of the fourth UNFCCC technical workshop JI on 15-16 October 2007.

IETA welcomes the opportunity to submit input and to suggest topics that are of interest to stakeholders in regards to JI and track 2. IETA has identified two types of issues that it would like to see addressed during the upcoming workshop. First of all there are topics that relate directly to the work of the JISC. Secondly IETA would like to highlight a number of subjects that are not directly related to the work of the JISC but to the track 2 procedures in general. IETA acknowledges that the latter concerns are not within the scope of the JISC but would nevertheless encourage the JISC to initiate discussions on the topics during the workshop as they are of prime interest to project developers. Furthermore IETA thinks, and also the JISC has indicated, that this meeting should be an opportunity to discuss JI issues of interest and not only JISC related topics.

This letter will start out with the issues that IETA has identified and would like to see discussed during the workshop and that are under the control of the JISC. The second part of the letter will refer to those issues that are not necessarily the responsibility of the JISC but are of importance to the overall functioning of track 2.

With regard to possible topics related to the work of the JISC IETA would like to suggest the following:

- Provide further guidance on methodological approaches

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- Guidance for AIEs on how to put together methodologies
- Establish consistency across projects – e.g. clarify whether PPs are encouraged to use CDM approved methodologies or those methodologies that are already approved by AIEs
- Guidelines needed on additionality, in particular on how to view various technologies
- Formulate Modalities of Communication similar to CDM
- Will sectoral/national baselines be developed and accepted?

General issues of interest to stakeholders that relate to the JI process under track 2, which should be included in the workshop:

- As many of the project developers from the CDM are now moving into JI a Side-by-side comparison of whole JI process (each track) with CDM would be useful
- Discussion on the main issues that have come forward during the initial determinations by DOE/AIE/IEs where additional guidance is required from the JISC – e.g. approval/determination of methodologies, financial hurdles
- Discussion on the issues that the Designated Focal Points are dealing with from their interaction with the project developers and DOE/AIE/IEs – e.g. measures to address EU-member states' double-counting, project approval and registration
- Discuss procedures on the issuance and transfer of ERUs, highlight the different approaches taken by JI host countries and how they are perceived to be functioning
- Establish guidelines for host countries on issuance, JI track 2 Guidelines etc.

Setup of the workshop:

We would like to propose that instead of having one room in which all participants work and listen to presentations, that after each introduction to a topic the participants are broken up in small groups in which they can discuss the topic come with recommendations which can be brought back to the larger group for a final round of discussions. Although this requires some work from the moderator/panel members to bring out clearly the questions that they want the working groups to answer, it will create a more interactive session in which ideas will be more easily been identified and brought to the attention of the audience.



IETA trusts that the above comment will assist the Supervisory Committee in setting up a successful fourth technical workshop and in proceeding in a manner that will benefit the overall process of the JI.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Andrei Marcu".

Andrei Marcu
President and CEO, IETA



