

JI Technical Workshop Bonn, September 2011

JI Guidelines Revision Feedback

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Background

By its decision 4/CMP.6, the CMP decided to initiate the first review of the JI guidelines at its seventh session.

JISC presented draft document contained in Annex 2 to Agenda of JISC 26 meeting

Two phases approach

The concept of two phases approach presented in the draft document but one cannot find further elaboration on this approach thought the document.

Therefore, this presentation would address current draft text of the document and reflects only on JI guidelines revision described in the document.

Concrete and detailed steps of each separate phase should be presented and described in the separate document in order to analyze this approach.

Revision process approach

Two Phases approach

- CMP 7 adopt outline of revised **operational model** for JI
- CMP 8 adopt revised **JI Guidelines**

JI Guidelines, paragraph 8, says:

...The first **review** shall be carried out no later than one year after the end of the first commitment period, based on recommendations by the Article 6 Supervisory Committee and by the Subsidiary Body for Implementation drawing on technical advice of the Subsidiary Body for Scientific and Technological Advice, as needed.

But there is no provision on JI operational model existence or revision.

Clarification on operational model outline is needed

Additionality

Additionality keeps and continues to be core requirement of JI process. What about streamlining of additionality process?Any activity in EITs leading to emission reductions and benefiting the atmosphere should be supported

JI in overall climate change regime

- Why do we need to mention that JI does not carry any risk of increasing overall emission reduction allowed to Annex 1? It's negative message!
- Neither JISC nor COP has authority to interfere with EU ETS or any other domestic and regional trading schemes, so there is no point of mentioning it in this documents
- Allowance price mentioning is not relevant

Single Verification Process Steps

- New design document development?
- JI Registry establishment on what provisions, and who's control? Changes into ITL rules and procedures
- Sufficient AAUs transfer or "set-aside" prejudging that AAUs would still exist after true-up period?
- "Issuance" of credits and it's distribution legal provisions for such actions? ERUs could not be issued!
- "Issuance" of credits would still be possible if Party is not eligible but how AAUs could be transferred then?
- How would host Party be able to report on registry and comply, if it does not manage the whole registry?

JI Governing Body

- who is making decisions on registration, rejections or suspension and legal basis for those actions?
- who would be responsible for assessment of JI activity and on what legal basis?
- reports of verifiers cannot be the basis for "issuance" any credits
- establishment of special committees for different activities is relevant if there is sufficient number of projects
- business and environmental constituencies to be members? Would they take commitments as Parties too in this case?
- appeal process does not even exist in CDM yet? How realistic to have it under JI?

New Terms and Definitions

- Avoid JI specific terminology? Why?
- JI validation process to replace determination?
- New design document to replace PDD?
- New JI governing body to replace JISC?
- JI participants who are they? Definition
- JI operational model what is it? Definition
- Accredited verifiers to replace AIEs?
- Assessment of JI activity? Legal or technical part?
- "Issuance" of credits to replace current converting AAUs?
- Para 35 does not make sense at all! Conservative baseline or discounting?

Change of terms vs change of rules

- No JI approval form investment Party. Is it still Joint Implementation?
- ERUs "issuance" vs converting AAUs into ERUs? Current KP rules does not allow to issue ERUs it could only be converted from AAUs. Do we create new units?
- New governing body vs JISC?

Timeframe!!!

Two phases approach could provide effective and real moving forward on JI enhancement by allowing 2 processes to be advanced in parallel

Under current JI Guidelines there is no procedure to switch from Track 1 to Track 2, which has been an issue on the table for more than 6 months! So any changes or establishment of new mechanism and new governing body would take at least 2-3 years

Thank You

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