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GROUP



# **Guidance on criteria for baseline setting and monitoring**

*Draft version 3 for consideration by JISC 26*

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# Guidance always welcome

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- Value of further guidance somewhat marginal with post 2012 questions still in flux
- Nevertheless issues raised are real barriers experienced during determination processes
- Even though flow of new projects are drying up, existing projects may benefit from further clarity on their way to “registration”

# Comparable projects

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- Clarifying the use of approaches from comparable projects makes lot of sense
  - Contrary to CDM, JI is case law driven and needs to build upon and utilize the approaches already applied
  - Determining whether an approach is comparable is beyond simple check lists for AIE's
- Conditions are generally clear and reasonable
- 12 (a) and (b) overlap and could be made clearer
- Conditions should provide basis for a “fast track” use of approaches from other projects, but not be exclusive
- In other situations it should still be possible when it can be justified

# An example

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- Baselines capped by existing production capacity
- Physical properties of the plant determine production capacity, completely independent from the regulatory and sector environment of the host Party
- Should be possible to use the same approach for determining the capacity limit as has been applied in another country
- The condition concerning geography ought to be rephrased:  
“Provided that the approach applied is impacted by the regulatory and sector environment of the host Party the proposed project and the other project(s) are to be hosted by the same Party...”

# Generic solution

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- Or simply apply a more generic solution by amending to:  
“Moreover, a project may be considered comparable if appropriately substantiated and justified, and in any case shall a project shall be considered comparable only if the following conditions apply and are appropriately substantiated and justified:”
- Will also solve difficulties with specific time limits and situations where approaches from different technology makes sense

# Prior consideration

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- There has to date been no specific requirement for prior consideration in the JI guidelines
- If prior consideration is to be a requirement it should be done in a clear, objective and forward-looking manner
- Provide procedure for prior notification and make it a requirement with a reasonable grace period
- If included in the current form it will retroactively set new requirements and with no clarity on the form of evidence to be provided