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# JIAG

## JIAG communication to JISC 22

JISC 22

Bonn, 15 - 16 June 2010

Lennard de Klerk

Chair JIAG

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In the past weeks JIAG has been actively working to provide input for the roundtable and JISC22. These include:

- Call for public inputs on experience with the verification procedure, focusing on the **existing Guidance and Guidelines**
- Call for public inputs on experience with the verification procedure, focusing on the **future operation of JI**
- Draft procedures on **materiality** and **project deviations**
- Further input on participation of Belarus and Kazakhstan.

Call for input of non-JIAG members for JISC22 closed 2 June.

# Materiality



We support the draft as it is and appreciate the simple set-up.

We propose **to expand** the applicability to other uses, for example:

- Whether identified **leakage** can be neglected in the PDD;
- Apply whether an emission source is **significant** and should be included in the project boundary.



The materiality should be set at **2%** or **5%** with a threshold of 300,000 ERUs/year. This equals the threshold in the ETS which also operates in a capped environment.

# Changes in project implementation



We support the draft and appreciate the simple set-up.

Paragraph 7 d, which reads *“the changes do not alter the original determination opinion for the project”*.



We believe that this requirement would effectively does not allow for any changes in project implementation, unless that JISC specifies what is meant with this requirement.

# Belarus and Kazakhstan



JIAG requested the JISC to allow project from Belarus and Kazakhstan to start and complete **the determination procedure** (i.e. PDD publication and final determination)

**Our main argument:** Even is not all eligibility requirement are not yet met, the determination procedure can be started.

**This is not the first time this has happened. Ukraine, Lithuania and Bulgaria all were allowed to have PDDs published and determination finalized prior to establishing the Assigned Amount.**

**JI eligibility is required for ERU issuance and transfer but not for any of the project stages before.**

# Applicability of newer version numbers



The JI secretariat rules that the most recent versions of Guidance and PDD Guidelines are to be used on the moment of final determination.



This would result in a **retroactive** application of versions to prepared PDDs and will disrupt the determination process.

The JIAG strongly urges to rule that the most recent version of Guidance and Guidelines should be used **at the start of the determination process** (i.e. with the publication of the PDD), with a grace period of two months.



**Global Carbon BV (chair)**

**Lennard de Klerk**

**Climate Focus (secretariat)**

**Jelmer Hoogzaad  
Moritz von Unger**

**Core Carbon Group**

**Morten Prehn Sorensen**



**Vertis Environmental Finance**

**James Atkins**

**Carbon Trade & Finance**

**Ingo Ramming**

**Future Camp**

**Roland Geres**

**Greenstream**

**Hanna-Mari Ahonen**



**Web: [www.jiactiongroup.com](http://www.jiactiongroup.com)**