

DOE/AIE Forum | *Martin Enderlin* | 24 November 2011

# JISC-27: Relations with AIEs and applicant Independent Entities

# Agenda

- Submissions by AIEs since JISC 26
- Inputs by AIEs to JISC 27 agenda
- Input by AIEs on JI AP27
- Input by AIEs at JISC 26

# Submissions by AIEs since JISC 26

- **Request for clarification as to the procedure of Track switching ( I => II):**
  - BVC generic submission (20 June 11) based on letter VEMA (31 May 11)
  - UNFCCC reply (15 September 11)
- Clarification is appreciated (no restriction regarding switching; compliance with section E of JI guidelines in its entirety is requested)
- Quick response time is important for PP. Having the same standard as for CDM (3 weeks instead of nearly 3 months for RfC) would be appreciated.
- As the issue of generic character it is likely of interest to all AIEs. Sending an notification link about the clarification to all AIEs through the JI-IE-list serve would be highly appreciated (active information sharing by UNFCCC).

# Inputs by AIEs to JISC 27 agenda

- Annex 1: Draft guidelines on the demonstration and assessment of prior consideration of JI
  - Draft guidelines are clear and appreciated as guidance on this core issue has eagerly been awaited by AIEs.
  - Drawing on relevant guidelines from CDM seems in general appropriate, in particular as deadlines have been appropriately adapted (2.8.2008 => 1.12.2012).
  - We welcome clarity, but also flexibility (e.g. with regards means to substantiate evidence: emails allowed, if cross-checked by e.g. tel.)

# Inputs by AIEs to JISC 27 agenda

- Annex 1: Draft guidelines on the demonstration and assessment of prior consideration of JI
  - Our general view:  
Guidelines shall only apply to new projects, but not to on-going projects (to avoid potential retroactive application of new requirements).
  - A grace period should allow for completing a started determination within a given time frame. If applied to determinations, which have not started yet (new publication of PDDs) the grace period may result in a rush of publications of new PDDs just before the end of the grace period.

# Inputs by AIEs to JISC 27 agenda

- Annex 1: Draft guidelines on the demonstration and assessment of prior consideration of JI
  - Linking a proposed grace period for **started** determinations (close to be concluded) with a date in the future (1.1.2012) that refers again to **starting** a determination is not logic, but an articial delay mechanism proposed by the Secretariat.

# Inputs by AIEs to JISC 27 agenda

- Annex 1: Draft guidelines on the demonstration and assessment of prior consideration of JI - CONCLUSION
  - Given the legal characteristics of „guidelines“ and to apply a parallelism to CDM **we support the application of these guidelines with immediate effect to all new projects (new publication of PDD)** after adoption @JISC27.
  - A grace period shall be granted to ongoing projects and a reference should be made to a final date until which determinations, that have started before JISC27, but are not complying with those guidelines, may be submitted to JISC, e.g. 8 months after JISC27, i.e. 25.07.2012.

# Inputs by AIEs to JISC 27 agenda

- Annex 2: Draft revised forms under the verification procedure
  - AIE verification report Form (F-JI-VRep), V.04:
    - We appreciate the explicit reflection of the „standard for applying the concept of materiality [and level of assurance] in verifications“.
    - Some AIEs, however, reported that the application of this standard is not fully clear at the moment given the recent discussions in CDM.

# Inputs by AIEs to JISC 27 agenda

- Annex 2: Draft revised forms under the verification procedure
  - With reference to decision 3/CMP.5 that the JISC conducts an assessment of the implications of possible inclusion of the concepts of materiality and level of assurance in joint implementation (JI) for the process of determinations referred to in paragraphs 33 and 37 of the JI guidelines we hope the JISC will integrate this concept also in determinations, incl. such reference in the AIE determination report Form (F-JI-DRep), V.03 at a later stage.

## Inputs by AIEs to report JI AP27

- No comments as JI AP27 has been postponed (due to ongoing accreditation assessments and costs)
- However, as reported at the last DOE/AIE Forum meeting, concerns have been raised by some AIEs about the workload, coordination and costs from the ongoing accreditation process.

# Input by AIEs at JISC 26

- Remains unclear, how and when „focused assessment“ will be implemented with what consequences on the accreditation process (31.12.12 deadline)

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