



Submission on JI PDD format and Guidelines

From: Climate Focus
To: JI Supervisory Committee
Date: 27 April 2006.

Introduction

This note responds to a call for public input on the draft JI PDD form and draft guidelines for users, and proposes that the Guidelines include a reference to the differences in approach to calculating emission reductions under JI compared to CDM as well as to defining additionality.

According to paragraph 3 (e) of the “Guidelines for the implementation of Article 6 of the Kyoto Protocol” the Joint Implementation Supervisory Committee (JISC) is responsible for the “elaboration of the Article 6 project design document, for consideration by the COP/MOP, taking into consideration appendix B of the annex on modalities and procedures for a clean development mechanism and giving consideration to relevant work of the Executive Board of the CDM, as appropriate”.

Analysis of the Draft PDD and its Guidelines

Marrakech Accords. Paragraph 24 states:

“the verification of reductions in anthropogenic emissions by sources or enhancements of anthropogenic removals by sinks from an Article 6 project as being additional to any that would otherwise occur, in accordance with Article 6, paragraph 1(b), shall occur through the verification procedure under the Article 6 supervisory committee”

Additionality. The description of additionality allows for considering a JI project to be additional if it reduces emissions below the baseline. The question of “why” a project is implemented which is an important issue in the “Tool for the demonstration and assessment of additionality” currently used in most CDM project activities, should be left out of a JI test for additionality. The approach under JI should be that reduction of emissions below the baseline should be considered additional. In earlier discussions on additionality under the CDM this has been referred to as “environmental additionality”.

Baseline. Section B3 in the “Draft PDD form” refers to a “baseline methodology”. The definition of “Baseline methodology” in the Guidelines raises the suggestion that use of CDM methodologies is the only way to calculate a baseline under JI. The COP/MOP agreed with use of approved methodologies for baselines and monitoring under the CDM, including small scale, for JI. Under the CDM such methodologies need to be approved by the Executive Board. Project developers can choose to elaborate their own methodology for JI, independent of the existing CDM methodologies. Climate Focus recommends to highlight in the Guidelines that prior approval of such methodologies by the JISC is not necessary under JI and that project developers can elaborate a baseline on a project-specific basis and/or using a multi-project emission factor.