



Joint Implementation *Action Group*

Input on experience with the verification procedure under the JISC

Version 1.2

Global Carbon BV
04.06.2010

:FutureCamp
Climate GmbH



GreenStream

GC GLOBAL
CARBON



CONTENTS

2.1. Section A. Background	5
2.2. Section B. Choice of JI specific approach or an approved CDM methodology.	6
2.3. Section C. Guidance on criteria for baseline setting	6
2.4. Section D. Guidance on monitoring	11
2.5. Annex 1. Additionality	13
2.6. Annex 2. Calculation of emission reductions or enhancements of net removals	
14	
2.7. Appendix A. General guidance on estimations/calculations used in the	
baseline and the monitoring plan	15
2.8. Appendix B. List of standard variables	16
3.1. PART I A. General information on the joint implementation project design	
document form.....	17
3.2. PART I B. Glossary of joint implementation terms	17
3.3. PART II A. Information note for the joint implementation project design	
document form.....	18
3.4. PART II B. Specific guidelines for users of the joint implementation project	
design document form.....	18

1. Introduction

The JISC, at its twenty-first meeting, requested the UNFCCC secretariat to launch a call for public inputs on experience with the verification procedure under the JISC with a view to making improvements for the future operation of JI. The public inputs will be considered at the roundtable consultations and by the JISC at its twenty-second meeting (JISC 22). It is expected that the results from the call will be an important basis for the JISC's report to the CMP on the future operation of JI post-2012 and to improve the current operation of JI in the first Commitment Period. Public inputs are solicited regarding the experience with the verification procedure under the JISC with a view to making improvements for the future operation of JI. In particular, respondents to this call are encouraged to provide inputs regarding the following issues:

1. Participation requirements for JI;
2. Involvement, actions and roles of different actors, including the JISC and its support structure; Parties and designated focal points (DFPs); accredited independent entities (AIEs); project participants; and international and non-governmental organizations;
3. JI project requirements and guidelines (baseline setting and monitoring, additionality, etc.)
4. Accreditation of independent entities;
5. JI forms;
6. Management and governance of JI and the JISC;
7. Recommendations and proposed improvements for the future operation of JI;
8. Other issues.

This report will focus on items 3 and 5 with particular attention to the main documents governing the process of JI project development. These documents are:

- Guidance on Criteria for Baseline Setting and Monitoring (version 02) (hereinafter referred to as Guidance),
- Guidelines for users of the Joint Implementation Project Design Document Form (version 04) (hereinafter referred to as Guidelines),

Changes to the following documents are also suggested as the result of the review:

- Glossary of JI terms (version 02) (hereinafter referred to as Glossary),
- And the PDD Form itself (hereinafter referred to as Guidance).

The aim of this report is to provide input that will help the secretariat and JISC to make necessary reviews of the documents that will facilitate the development process in the JI cycle including PDD writing, determination, monitoring and verification. The suggestions come from the careful analysis of the documents and are also based on practical experience with JI projects, determinations and verifications.

The scope of the report includes some high importance areas in the JI procedures and documents that are the source of frequent debates between project participants and

AIEs and some minor fixes that can significantly speed-up the process of project development, determination and verification.

Contributions to this report were provided by: Lennard de Klerk, Denis Prusakov, Denis Rzhakov, Oleg Bulany, Alexey Doumik (all Global Carbon), Konstantin Myachin (CTF), Felix Nickel (FutureCamp Climate) Yevgeniy Groza and Konstantin Tadlya (GreenStream). Furthermore input from Ivan Sokolov and Svitlana Garienchyk (Bureau Veritas Certification Ukraine) were provided. Note that this report reflects the input of JIAG, but not necessarily of the AIE forum and/or Bureau Veritas Certification.

2. Review of the Guidance

2.1. Section A. Background

Paragraph	Current content	Review rationale	Suggested change
7	<p>This document takes up the general provisions contained in appendix B of the JI guidelines on criteria for baseline setting in section C. below and on monitoring in section D. below and elaborates on them in the specific context. When preparing a project design document (PDD) for a JI project the present document shall be taken into account in addition to the guidelines for users of the relevant JI PDD form.</p>	<p>As it says the Guidance and Guidelines are to be taken in account when preparing the PDD. Therefore, in order to prepare the PDD, project participants have to skip back and forth between the documents, trying to satisfy in the PDD all requirements of the Guidance and Guidelines. As the whole purpose of the Guidance is to elaborate the requirements of JI guidelines and facilitate PDD development it may be more practical to merge Guidance and Guidelines into one document – PDD Manual. Also, wording “takes up” does not explain the nature of the document.</p>	<p>Major: Include all PDD development and JI project requirements into one document PDD Manual that will contain concise, decisive instructions for the JI project development. The focus of this document will be the correct preparation of PDD in line with the JI Guidelines. Quick Fix: Change the wording of the purpose of this document to "specifies general provisions ...".</p>
8	<p>A JI project is a project aimed at: (a) Reducing anthropogenic emissions by sources of greenhouse gases (GHGs); or (b) Enhancing net anthropogenic removals by sinks of GHGs (hereinafter</p>	<p>This is in practice the definition of the “JI project”. This definition is not present in the Glossary, where a similar definition is applied to a Project. In fact, the purpose of the PDD is to prove that a project at hand is a JI project. Lack of clear distinctions in definitions of Project and JI Project results in misunderstandings and additional questions during</p>	<p>Quick Fix: Remove the paragraph as the similar definition is contained in the Glossary or re-phrase the definition from “JI project” to a “project can be considered as JI if it is aimed to:”</p>

	referred to as JI LULUCF project).	determination.	
--	------------------------------------	----------------	--

2.2. Section B. Choice of JI specific approach or an approved CDM methodology

Paragraph	Current content	Review rationale	Suggested change
10, 11	The approved CDM methodology shall be used in its totality, including all explanations, descriptions and analyses	This is leading to inability to use some good quality CDM methodologies by the project participants when some minor requirements are not met. For example, ACM0002 cannot be used in renewable energy projects if the grid emission factor is not calculated with the “Tool to calculate the emission factor for an electricity system”. For some projects in JI an alternative emission factor or multi-project emission factor exists. On the other hand, JI specific approach allows using elements of the approved CDM methodologies without justification which leads to contradictions.	Major: Allow deviations from approved CDM methodologies if applicability criteria of the methodology are met and the deviations consist of applying emission factor used in already finally determined project etc.

2.3. Section C. Guidance on criteria for baseline setting

Paragraph	Current content	Review rationale	Suggested change
13	Reiteration of the paragraph 1-3 of the appendix B of the JI Guidelines	Throughout the text of the document pieces of the JI guidelines are quoted. Furthermore, paragraph 29 of the Guidance says that “In any case: (a) The project participants shall set a baseline in accordance with appendix B of the JI	Major: Remove this paragraph and modify this document in a way that following its provisions will automatically result in a baseline being set in accordance with appendix B of the JI guidelines. It should be clearly defined that while the Guidance is based on JI Guidelines project participants during

		guidelines;" which does not give enough authority to the document in question.	the preparation of the PDD and AIE during determination should follow the Guidance (or PDD Manual) instead of direct interpretation of JI Guidelines.
14	In the case of a JI project aimed at reducing emissions, the project boundary shall: ... (iii) Significant, i.e., as a rule of thumb, would by each source account on average per year over the crediting period for more than 1 per cent of the annual average anthropogenic emissions by sources of GHGs, or exceed an amount of 2,000 tones of CO equivalent, whichever is lower; and	This definition is not justified and is provided literally "as a rule of thumb". The concept of materiality can be applied here for the more accurate estimation of the significance.	Quick Fix: Replace the paragraph (iii) with the word "material". The reference to a standard for applying the concept of materiality should be also provided.
17, 18	17. Leakage is the net change of anthropogenic emissions by sources and/or removals by sinks of GHGs which occurs outside the project boundary, and that can be measured and is directly attributable to the JI project. 18. Project participants must undertake an assessment of the potential	The leakage estimations must be provided only when it is practical to do so. The concept of materiality must be also applied here to define the sources of leakage for which project participants must undertake an assessment of the potential leakage.	Quick Fix: Insert the word "material" into the paragraph 18. The reference to a standard for applying the concept of materiality should be also provided.

	leakage of the proposed JI project and explain which sources of leakage are to be calculated, and which can be neglected. All sources of leakage that are included shall be quantified and a procedure for an ex ante estimate shall be provided.		
20	The baseline for a JI project: (a) Is the scenario that reasonably represents the anthropogenic emissions by sources or net anthropogenic removals by sinks of GHGs that would occur in the absence of the project; (b) Shall cover emissions from all gases, sectors and source categories listed in Annex A of the Kyoto Protocol, and/or anthropogenic removals by sinks, within the project boundary.	This repeats the content of the paragraph 13a.	Quick Fix: Either this or the paragraph 13a can be removed.
22a	22. A multi-project emission factor may be used and its application shall be justified. Sector-wide baselines may e.g. be used if: (a) The physical	In some projects the baseline study assumes that in the market environment where products can be transported freely (e.g. cement, steel, coal etc.) the sectoral emission factor can be applied for the baseline setting.	Quick Fix: Amend this paragraph with one more example describing specific emission factor for the manufacturing of freely transported products (e.g. cement, steel, coal etc.)

	<p>characteristics of the sector justify the application of a standard emission factor across the sector (e.g. in the case of an integrated electricity network with no major transmission constraints, the physical characteristics of the system may imply that the impact of a project on emissions can be assessed irrespective of its location); and/or</p>		
23	<p>A baseline shall be established in accordance with appendix B of the JI guidelines.</p>	<p>This is self-evident reiteration of the importance of the JI guidelines.</p>	<p>Quick Fix: Remove this paragraph.</p>
24	<p>A baseline shall be identified by listing and describing plausible future scenarios on the basis of conservative assumptions and selecting the most plausible one.</p>	<p>The wording "future scenarios" is misleading as to the actual date of baseline setting. The baseline should be set as of the starting date of the project. Also, the baseline a JI project is the scenario that reasonably represents the anthropogenic emissions by sources or anthropogenic removals by sinks of GHGs that would occur in the absence of the proposed project. Therefore, it is logical to exclude the project from the scenarios in the analysis.</p>	<p>Quick Fix: Change this paragraph to "baseline shall be identified by listing and describing plausible scenarios that would occur in the absence of the proposed project as of the starting date of the project on the basis of conservative assumptions and selecting the most plausible one. The project scenario should be excluded from the analysis."</p>
25	<p>A baseline shall be established taking into account relevant national</p>	<p>As the baseline should be set as of the starting date of the project this paragraph should be modified accordingly. Also, not</p>	<p>Quick Fix: Add to this paragraph the wording "taken into account as of the starting date of the project" and "as appropriate."</p>

	and/or sectoral policies and circumstances, such as sectoral reform initiatives, local fuel availability, power sector expansion plans, and the economic situation in the project sector. Key factors that affect a baseline shall be taken into account, e.g.	all of the key factors that affect the baseline are present in all cases.	
26	(b) Taking account of uncertainties and using conservative assumptions; and	Throughout the text of the document numerous references to the uncertainties and conservativeness are made. In practice, however, it is not always clear how it can be taken into account.	Major: Further explanations on how uncertainties are taken into account and what are the conservative assumptions should be provided. Practical applications should be considered in every case.
28	The project participants shall justify their choice of baseline taking into account annex 1 to this document. If the baseline approach chosen differs from approaches already taken in comparable cases (same GHG mitigation measure, same country, similar technology, similar scale) that an AIE has positively determined, the differences shall be explained and justified.	This requirement implies that the same approach can be used to set the baseline. Approach described here and also similar in nature to one of the ways to demonstrate additionality provided in this document can be applied to baseline setting.	Major: Amend Section B and part 4 of the section C of this document with the following option for baseline setting "JI specific approach already taken in comparable cases (same GHG mitigation measure, same country, similar technology, similar scale) that an AIE has positively determined and these similarities have to explained and justified". Also, we suggest that a definition of "positively determined project" has to be added to the Glossary (e.g. the project for which an AIE has issued the determination report with all corrective actions requests and clarification requests resolved with the exception of approvals of the Parties involved provision).
29	In any case: (a) The project participants	This repeats the content of the JI guidelines.	Quick Fix: Remove this paragraph.

	<p>shall set a baseline in accordance with appendix B of the JI guidelines;</p> <p>(b) The host Party/Parties (as well as the other Parties involved) has/have to approve the project; and</p> <p>(c) The AIE has to determine whether the project has an appropriate baseline in accordance with the criteria set out in appendix B of the JI guidelines.</p>		
--	--	--	--

2.4. Section D. Guidance on monitoring

Paragraph	Current content	Review rationale	Suggested change
30	Paragraphs 4-6 of appendix B of the JI guidelines contain regulations with regard to monitoring:	This repeats the content of the JI guidelines.	Major: This paragraph can be removed and its content should be elaborated in other paragraphs of this section
32	in particular also all decisive factors for the control and reporting of project performance	This phrase does not describe decisively what should be monitored and as such it is difficult to apply in practice.	Quick Fix: Remove this phrase from the paragraph or provide clarification for the notion “all decisive factors”.
32e	Present the quality assurance and control procedures for the monitoring process. This includes, as appropriate,	This implies explanations to be provided on the management system applied at the project implementation.	Quick Fix: Modify this paragraph so that data on management procedures are provide instead.

	information on calibration and on how records on data and/or method validity and accuracy are kept and made available on request;		
35	If a national or international monitoring standard has to be and/or is applied to monitor certain aspects of the project, this standard shall be identified and a reference as to where a detailed description of the standard can be found shall be provided. Whenever possible, internationally recognized standards/methods with regard to monitoring (as well as calibration, as appropriate) should be applied.	As some standards can be applied to monitoring without being monitoring standards by itself it is suggested to reflect this in the paragraph.	Quick Fix: Replace "monitoring standards" with "standards with regard to monitoring" throughout the text.
36	In any case: (a) The project participants shall set a monitoring plan in accordance with appendix B of the JI guidelines, in particular covering the criteria listed in paragraph 30 (a) above; (b) The host Party/Parties (as well as the other Parties	This repeats the content of the JI guidelines.	Quick Fix: Remove this paragraph.

	<p>involved) has/have to approve the project; and (c) The AIE has to determine whether the project has an appropriate monitoring plan in accordance with the criteria set out in appendix B of the JI guidelines.</p>		
--	--	--	--

2.5. Annex 1. Additionality

Paragraph	Current content	Review rationale	Suggested change
2b	<p>Provision of traceable and transparent information that an accredited independent entity has already positively determined ...</p>	<p>It is not clear what exactly is meant by positively determined.</p>	<p>Major: Definition of "positively determined project" must be provided and added to the Glossary (e.g. the project for which an AIE has issued the determination report with all corrective actions requests and clarification requests resolved with the exception of approvals of the Parties involved provision).</p>
2b	<p>... a justification why this determination is relevant for the project at hand.</p>	<p>It is hard to provide such justification in practice. Also, the criteria to apply such approach should be provided in this paragraph which should be sufficient justification by itself.</p>	<p>Quick Fix: Remove this phrase from the paragraph or elaborate on a sort of comparability analysis between the projects regarding same GHG mitigation measure, same country, similar technology, etc., shall (must) be provided by the Project Participants.</p>
2c	<p>Application of the most recent version of the "Tool for the demonstration and assessment of additionality" approved by the CDM</p>	<p>In order to account for the differences between two flexible mechanisms it is suggested to modify the way the Additionality Tool is applied by excluding references to CDM-PDD guidelines and</p>	<p>Major: Modify the text of the paragraph in a way that the Additionality Tool is applied in its full including the Guidance on investment analysis but the references to CDM-PDD guidelines and CDM-specific guidance (e.g. on crediting periods etc.) do</p>

	Executive Board (allowing for a grace period of two months when the PDD is submitted for publication on the UNFCCC JI website), or any other method for proving additionality approved by the CDM Executive Board.	other CDM-specific guidance by the CDM-EB.	not apply
--	--	--	-----------

2.6. Annex 2. Calculation of emission reductions or enhancements of net removals

Paragraph	Current content	Review rationale	Suggested change
3	The project boundary chosen affects the identification of sources/sinks for which emissions or net removals have to be assessed when estimating/calculating reductions of anthropogenic emissions by sources or enhancements of net anthropogenic removals by sinks of GHGs.	This paragraph is not specifying or elaborating any of the previously mentioned requirements and can be removed.	Quick Fix: Remove this paragraph.
7	The estimations/calculations referred to in paragraph 2 above shall, in particular, be based on conservative assumptions and the most plausible scenarios, and be	It is enough from the practical perspective to provide transparent calculations. This will provide enough information so that determination can be made on the calculation.	Quick Fix: Remove this phrase from the paragraph " in particular, be based on conservative assumptions and the most plausible scenarios, and ".

	<p>conducted in a transparent manner. In this context the project participants may draw on appendix A to this document, as appropriate.</p>		
--	---	--	--

2.7. Appendix A. General guidance on estimations/calculations used in the baseline and the monitoring plan

Paragraph	Current content	Review rationale	Suggested change
-	<p>The document has annexes and appendices.</p>	<p>It is more practical to transform current annexes to sections of the document and appendixes into annexes.</p>	<p>Quick Fix: Remove this paragraph.</p>
1h	<p>The uncertainty of key parameters should be described and, where possible, an uncertainty range at 95% confidence level for key parameters for the calculation of emission reductions or enhancements of net removals should be provided.</p>	<p>This is not practical. Also, no guidance is provided as to how the identification of the uncertainty is later taken into account.</p>	<p>Quick Fix: Remove this phrase from the paragraph or provide further guidance on the definition of uncertainty and on practical applicability of this requirement.</p>
1l	<p>Taking into account that a baseline should be established in a transparent manner and using conservative assumptions explicitly explain the assumptions and substantiate choices. In case of uncertainty</p>	<p>This is the reiteration of the already provided guidance. As such it can be avoided.</p>	<p>Quick Fix: Remove this paragraph.</p>

	<p>regarding values of variables and parameters, the establishment of a baseline is considered conservative if the resulting projection of the baseline does not lead to an overestimation of emission reductions or enhancements of net removals attributable to the JI project.</p>		
--	---	--	--

2.8. Appendix B. List of standard variables

Paragraph	Current content	Review rationale	Suggested change
-	List of standard variables.	This is too detailed and simply reflects general common practice.	Quick Fix: Remove this appendix. Regarding the perspective of elaborating a JI PDD Manual, it's worth leaving this list as reference information.

3. Review of the Guidelines

3.1. PART I A. General information on the joint implementation project design document form

Paragraph	Current content	Review rationale	Suggested change
10	In accordance with the JI guidelines, the working language of the JISC is English. The JI PDD form shall therefore be completed and submitted in English.	A further elaboration of this paragraph is required to clarify specific cases of names, trademarks etc.	Quick Fix: Amend this paragraph with the following information "geographic names, trademarks etc. should be appropriately transliterated. Exceptions can be made for the hyperlinks in non-Latin domains and references to external sources in foreign languages if appropriate transliteration and/or translation are provided".
11	The JI PDD form shall not be altered. It shall be completed without modifying/adding headings, logo, format or font. Tables shall not be modified or deleted (unless otherwise indicated). However, rows may be added as needed.	To facilitate the understanding of this it is proposed to further elaborate in this paragraph on where exactly the indication of the possible changes can be found.	Quick Fix: Amend this paragraph with the following information "unless otherwise indicated in this document or the PDD Form".
12	The completed JI PDD form shall include in section A.1. the version number and the date of the document.	This is already covered in the explanations under section A.1.	Quick Fix: Remove this paragraph.

3.2. PART I B. Glossary of joint implementation terms

Paragraph	Current content	Review rationale	Suggested change
-----------	-----------------	------------------	------------------

10	The Glossary is a separate document.	The name of this section is misleading.	Quick Fix: Remove the section and make reference to the Glossary.
----	--------------------------------------	---	--

3.3. PART II A. Information note for the joint implementation project design document form

Paragraph	Current content	Review rationale	Suggested change
3	The project participants shall submit the completed JI PDD form, together with attachments, if necessary, to an AIE for determination.	A change is suggested to stress the necessity of attachments submission if they exist.	Quick Fix: Change the word "necessary" to "applicable".
4	project participants shall submit documentation that contains confidential/proprietary information in two versions	It is not evident if the confidentiality provisions apply only to the PDD or also to the attachments.	Quick Fix: Replace the word "documentation" to the words "JI PDD form and attachments".

3.4. PART II B. Specific guidelines for users of the joint implementation project design document form

Paragraph	Current content	Review rationale	Suggested change
A.2.	Please also briefly summarize the history of the project (incl. its JI component)	It is not clear what a JI component is. In practice it leads to a lot of issues during the determination on what exactly should be provided in this section.	Quick Fix: Remove the words JI component or provide further explanation and definition of the JI component
A.3.	The table is provided in this section.	The table here is provided with unusual level of detail. Descriptions inside the cells are misleading and sometimes issues are raised by the AIE because of this table.	Quick Fix: Move this table to the JI PDD form and remove examples from the cells.
A.4.	Technical description of the	General structure of the Guidelines	Quick Fix: Merge the contents of the A.4.1.1-A.4.1.4

	project	suggests that sections filled with explanations should be completed. Here we have a lot of subsections were no explanations are provided. Also subsections are created for just one or two words.	into one subsection A.4.1. Put the content of the merged subsections into one explanation block. Also, it should be emphasized that no content is to be present in the completed PDD Form in places where there are no explanations in the Guidelines.
A.4.3	Please explain briefly how anthropogenic greenhouse gas emission reductions are to be achieved (details to be provided in section B.) and provide the estimate(s) of anticipated total reductions in tonnes of CO2 equivalent as determined in section E. Max. length: one page.	It is not clear if the one page requirement is applicable only to this section or it also covers A.4.3.1. Estimates of the emission reductions are provided in the table A.4.3.1 so there is no need to mention it in the explanation block. Also, the word "determined" is misleading.	Quick Fix: Amend the words "one page" with "excluding A.4.3.1". Remove the phrase "and provide the estimate(s) of anticipated total reductions in tonnes of CO2 equivalent as determined in section E" from the explanation block.
A.4.3.1.	Estimated amount of emission reductions over the crediting period:	It should be mentioned that separate tables must be provided for emissions reductions generated before and after the crediting period.	Quick Fix: Add separate tables for the periods before and after the crediting period.
A.5.	Written project approvals by the Parties involved should be attached.	The PDD cannot be submitted for final determination unless it has approval from the Party involved. There is no need to demand those approvals at the time of PDD writing	Quick Fix: Remove this section or rephrase it from "attached" to "explain how written approvals by the Parties are obtained".
B. Baseline	Explanation block right after the name of the chapter.	This is misleading and leads to some PDDs containing text before section B.1. Also, this is the reiteration of the JI guidelines and Guidance. Also the purpose of this chapter in the PDD and Annex 2 has to be clarified. The summary	Major: Remove this explanation block.

		of the key elements in tabular form as well as additional supporting documentation/information required in Annex 2 is repeating the information contained in the tables in section B.1.	
B.1.	Explanation block contained after section B.1.	The content of this block repeats the information already contained in the Guidance. Also, table suggested here is later required in Annex 2.	Major: Remove information that is repeated (e.g."If a JI specific approach regarding baseline setting is used in accordance with paragraph 9 (a) of the Guidance on criteria for baseline setting and monitoring, please provide a detailed theoretical description of the baseline in a complete and transparent manner, as well as a justification in accordance with paragraph 23 through 29 of the Guidance on criteria for baseline setting and monitoring. Elements or combinations of approved CDM baseline and monitoring methodologies may be applied, as appropriate. In such a case, the use of the most recent valid version(s) is encouraged. b) If an approved CDM baseline and monitoring methodology is used in its totality, in accordance with paragraph 10 of the Guidance on criteria for baseline setting and monitoring, the most recent valid version of the CDM methodology shall be applied when the PDD is submitted for publication on the UNFCCC JI website, allowing for a grace period of two months. Please indicate the title and reference number of the methodology, as well as its version, and describe why it is applicable. Please also provide all explanations, descriptions and analyses pertaining to the baseline in accordance with the approved methodology selected") in the Guidance and replace it with the relevant reference.

			Move the table contained here to the Annex 2.
B.2.	Explanation block contained after section B.2.	The step-wise approach here interferes with the steps of the Additionality Tool. The content of this block repeats the information already contained in the Guidance. It is not clear how the table from B.1. can be applied here.	Major: Remove information that is repeated (e.g."If a JI specific approach ... ") in the Guidance and replace it with the relevant reference. Remove the step-wise approach. Remove the phrase "As appropriate, the draft table provided under section B.1. above shall be completed for all relevant data/parameters. "
C.1.	The starting date of a JI project is the date on which the implementation or construction or real action of the project begins.	The Glossary provides definitions for the project and starting date of the JI project. The section is called starting date of the project	Quick Fix: Change the definition in the glossary to the starting date of the project. Modify this section accordingly.
D. Monitoring Plan	Explanation block right after the name of the chapter.	This is misleading and leads to some PDDs containing text before section D.1. Also, this is the reiteration of the JI guidelines and Guidance. Also the purpose of this chapter in the PDD and Annex 3 has to be clarified. The PDD format in this section is outdated with the landscape oriented tables. In the CDM this format has been improved not only in the PDD form, but also in newer versions of methodologies (each monitoring parameter gets an own short data table, which gives not only more room for parameter-specific descriptions, but also brings the simple advantage of common portrait format pages throughout the whole PDD). This does regularly lead to inconsistencies, when trying to squeeze all the information	Major: Remove this explanation block. Clear up inconsistencies between the PDD Form and the current possibility to use short independent parameter tables from B.1. in section D.

		requested for monitoring parameters by a CDM methodology into the old table-format. In some cases the AIE refused the use of this format in JI, referring to the prohibition to alter the JI PDD form.	
D.1.	Explanation block contained after section D.1.	The content of this block repeats the information already contained in the Guidance.	Major: Remove information that is repeated in the Guidance and replace it with the relevant reference.
D.1.1 and D.1.2	Option 1 Monitoring of the emissions in the project scenario and the baseline scenario. Option 2 Direct monitoring of emission reductions from the project	The correct use of the Option 1 and Option 2 is not clear. This leads to overcomplicated monitoring plans in some PDDs.	Quick Fix: Include here in the explanation block information on the possible applications of Option 1 and 2.
D.1.1.2	Formulae should be consistent throughout the document.	It can be useful to remind here the necessity of numbering.	Quick Fix: Include here in the explanation block a warning about the numbering of the formulae.
D.1.5.	Please provide reference to the relevant host Party regulation(s). If not applicable, please state so.	It is sometimes practical to provide this information under Section F.	Quick Fix: Include here in the explanation block a possibility to provide reference to section F.
F.1.	Please list and attach the documentation to the JI PDD.	It is not practical to actually attach all EIA documentation to the PDD.	Quick Fix: Change the words «list and attach ".to "list and summarize".
Annex 2	Please provide a table containing the key elements of the baseline (including variables, parameters and data sources). Please also attach additional supporting documentation/information.	As per the changes suggested earlier a table format indicated in the current B.1. section can be used here.	Quick Fix: Move here tables from B.1. Modify text accordingly.

Annex 3	Monitoring Plan	As this section remains blank in most PDDs it is proposed to rename it and reserve it for additional information on monitoring.	Quick Fix: Rename annex to "Additional information on monitoring". Insert explanation block saying "Please attach additional supporting documentation/information if applicable."
---------	-----------------	---	--

