ecoPartners Comments for the VCS JNR Leakage Estimating Tool

July 23, 2013

COMMENTS ON JNR LEAKAGE ESTIMATING TOOL

- *5.3.2 Analysis of Leakage Categories: Determining Global Commodity Leakage*

  Currently, this section asserts that the commodity leakage may be set to zero if sufficient mitigation strategies are in place. For a project's global commodity leakage to be set to zero, this system places the burden of proof on the developer to show that there is no significant reduction in commodity production. If the developer can prove that some mitigation is in place, but that not all leakage is mitigated, then they are required to use the leakage estimating tools. If the developer was required demonstration to use the same leakage estimation tools to show that no leakage has occurred it would avoid any inconsistencies in accounting.

- *5.4.2 Determination of Jurisdictional Leakage Deduction: Calculation*

  We are unsure as to why the leakage deduction percentage is applied to the net emissions reductions. Typically net emissions reductions are calculated as the gross emissions reductions less leakage, the buffer contribution, and the confidence deduction. It would follow that this leakage deduction percentage would be applied to gross emissions reductions.

  Furthermore, the term "total GHG emission reductions" is also included in this section and it is unclear what the word "total" is referring to. This should be changed to either "net" or "gross" for the sake of clarity.

- *Appendix 2: Rationale for the Default Values Used in the Leakage Tool*

  While we applaud the effort at transparency in this section, the sources that the committee used for arriving at these factors (two-thirds, 40%, 75%) are not referenced. Please provide these references or an analysis done by the committee so these inputs can be evaluated as to their conservativeness.

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