

 <p><b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b></p> <p>This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
<i>Name of the stakeholder<sup>1</sup> submitting this form (individual/organization):</i>	atmosfair gmbH Katrin Wolf
<i>Address and contact details of the individual submitting this form:</i>	Address: Zossener Str 55.58, 10961 Berlin Telephone number: +49 30 627355016 E-mail address: <a href="mailto:wolf@atmosfair.de">wolf@atmosfair.de</a>
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Request of clarifications regarding section 4.8, 4.8.1 and 4.8.2 of the General Guidelines for SSC CDM methodologies, version 21.0, (CDM-EB81-A35). The clarifications are relevant for our Nigeria cookstove PoA 5067 and in general for other similar projects
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<i>Specify whether you want the letter to be treated as confidential<sup>2</sup>:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<i>Please choose any of the type(s) below<sup>3</sup> to describe the purpose of this submission.</i>	
<input checked="" type="checkbox"/> <b>Type I:</b> <input checked="" type="checkbox"/> <b>Request for clarification</b> <input type="checkbox"/> <b>Revision of existing rules</b> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input checked="" type="checkbox"/> Guidance. Please specify reference <a href="#">General Guidelines for SSC CDM methodologies, version 21.0, (CDM-EB81-A35)</a> <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference  <input type="checkbox"/> <b>Type II: Request for Introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
<i>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</i>	

<sup>1</sup> DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

<sup>2</sup> As per the applicable modalities and procedures, the Board may make its response publicly available.

<sup>3</sup> Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

Dear Honorable CDM Executive Board,

Herewith we ask for clarifications regarding section 4.8, 4.8.1 and 4.8.2 of the General Guidelines for SSC CDM methodologies, version 21.0, (CDM-EB81-A35), which are relevant for our cook stove programme in Nigeria PoA (ID: 5067) and in general for other similar projects.

Clarification requests:

1. Paragraph 21 states that *'PA/CPAs may apply the result of the surveys for monitoring period up to 12 months after the date of the survey, ...'*. *The survey date is the date on which the data collection starts.*

We would like to clarify if that means the data of a survey are valid for 12 months, or if the subsequent monitoring report using the survey data has to be uploaded within 12 months of the start of the previous study?

Please confirm if the following example is true and valid assuming that conditions 21. a) and b) are fulfilled:

Monitoring Period 2 of a project is 1/1/2013-31/12/2013, the Monitoring Period 3 is 1/1/2014-31/12/2014. The data collection for the monitoring survey starts 15/1/2014. The result of the survey shows 90% usage rate of the cook stoves disseminated.

The 90% can be used for the calculation of emission reductions for Monitoring Period 2 (2013) and for Monitoring Period 3 (2014). The point in time when the monitoring reports for period 2 and 3 are uploaded to the UNFCCC is not relevant.

2. Paragraph 19 states that *'the requirements in this document do not overrule any provisions in the approved methodologies.'*
  - Does this imply that the provisions in section 4.8, 4.8.1 and 4.8.2 of CDM-EB81-A35 are only applicable if the applied methodology allows for biennial monitoring?
  - Does it further imply that survey data may be used for 2 monitoring periods, although sample size calculations were based on annual monitoring with the corresponding confidence/precision values?
3. In 22, 23 and 24 reference is made to paragraph 27, which is part of section 4.10 according to CDM-EB81-A35. Thus, we would like to get clarification whether these references are really linked to paragraph 27 or if this is an editorial mistake and the correct reference should be paragraph 21?
4. Paragraph 21 includes the formulation of *'lifespan'* whereas Paragraph 22 uses the wording of *'lifetime'*. We would like to ask for clarification on whether both words refer to the same or if there is a difference between the two.
5. According to footnote 5 the lifespan can be determined by the technology provider. We would like to know if the EB does not see a conflict of interest if the technology provider determines lifetime himself. Furthermore to our experience the lifetime of the technology can be significantly shorter on the ground compared to laboratory tests and thus suggest to require lifetime assessment based on assessments done in project scenario by independent parties.

6. In the context of paragraph 22 and 23 we assume that for other parameters than failiour rate ex-ante estimates are used for the calculation of emission reductions in the first 12 month, or would it be necessary to conduct a survey to determine other monitoring parameters, except of failiour rate?
7. We would further like to get clarifications on the question whether the verification under the application of paragraph 22 and 23 still require a DOE On-Site Visit and how the verification would be conducted?

*Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).*

Specific requests for clarification regarding our Nigeria PoA:

1. Paragraph 21 states that *'PA/CPAs may apply the result of the surveys for monitoring period up to 12 months after the date of the survey, ...'*. *The survey date is the date on which the data collection starts.*

The situation in our PoA in Nigeria is as follows:

MP1: 10/11/2011-30/6/2012  
Issuance received: 5/2/2014

MP2: 01/7/2011-30/6/2013  
Monitoring Survey started 11/09/2013

MP3: 1/7/2013 – 30/6/2014

Please confirm that the following statement is correct:

“Assuming conditions 21. a) and b) are fulfilled the results derived from the monitoring survey of MP2 are valid until 10/09/2014.

The results of monitoring survey MP2 can thus be used to calculate emission reductions for MP2 and MP3.

All monitoring parameters measured in the survey (fraction of operating devices, continuous use of baseline stove and efficiency of the stove) can be used to calculate the emission reductions of MP3”.

2. If the above statement is correct we assume that we can submit a request for issuance for MP2 and MP3 as soon as the DOE has approved the monitoring results for MP2 and the monitoring parameters for MP3 which are not covered by the survey (number of appliances deployed). Two separate Monitoring Reports and Verification Reports will be submitted. The DOE may determine if a separate on site visit is required to check the non-survey monitoring parameters of MP3.

*If necessary, list attached files containing relevant information (if any)*

- [replace this bracket with text, the field will expand automatically with size of text]

**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat	22 January 2015
Reference number	2015-380-S, INQ-02675

-----

History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		