

The UNFCCC Secretariat and the Executive board

Bonn

Dear Sirs;

We are grateful for the opportunity to comment on the data acquisition, control, assurance related activities for the establishment of sector specific standardized baselines.

We also kindly appreciate your acknowledgement of the possibility of data being available with DNAs, the understanding of ease of data collection through DNAs and also the flexibility of SB data collection by PPs and third parties as far as QA/QC procedures are met. This would reduce much of the data related burden in scaling up CDM projects in many underrepresented countries. However we perceive that the level of stringency of the procedures may be a bit above institutional frameworks of many DNAs. By any standard this is much heavier than the way we collect data to establish grid emission factors...which is some form of standardized baseline itself. In any case we forward the following comments on the guideline to help improve some aspects of the guideline.

1. **QA/QC establishing entities:** We appreciate the possibility of application of the QA/QC by range of stakeholders including DNA, PPS, etc. However, while PPs could have CDM incentives to invest on establishing QA/QC institutional arrangement, DNAs would be willing to assist in data collection but may not be capable to set aside funds on QA/QC standard preparations as such from their limited routine operational funds. Hence the UNFCCC may allocate or encourage donors to allocate a small fund to some DNAs for establishing QA/QC protocol and also outline the simplest acceptable custom made standard QA/QC manual applicable for a range of DNAs.
2. **11.h; Conservativeness;** the option of taking the conservative assumption (Example: average of top 20% performing plants) is a fair provision. However it should not be the only option. The possibility of using the technology performance (manufacturer's catalogue) of the subject plant with missing data should also be among the options, as it is even more conservative than its performance values given than brand new plants tend to perform better than deteriorated ones.
3. **The guide may clearly indicate the following helpful possibilities and order of priority of first order data collection efforts and second order data**
 - Direct plant level access to data
 - Data officially requested and obtained by DNAs
 - Data archived by Quality control authorities of the relevant sector
 - Official report, letter/fax from plants to any other entity and their public websites
 - Data collected by Government Authorities, sector ministries and national statistics offices, peer reviewed international statistics documents

- Data collected by research institutes, individual academic research works or UN development institutions
 - Data established based on technology supplier information
 - Data established using IPCC conservative assumptions
 - Data based on sampling as per relevant guideline
 - More conservative assumptions (including for non responses)
 - Data established by processing the above first order data, using algorithms
4. **On V (General provision) No; 13, there should not be a procedural requirement to obtain approval to alter the data template format unless the format is required to be changed entirely. Otherwise it would be another lengthy process for elements of minor significance.**

5. **Data Vintage and frequency:**

“For a Party with fewer than 10 registered CDM project activities as of 31 December 2010, the Board may establish different data vintage for certain sectors if necessary.” may add “including as reasonably proposed by the submitting entities”

6. **Completeness**

Number 16 reads “DNAs should include all installations/facilities/companies”. However, we have to address only “relevant” installations/facilities/companies. “Relevant” to mean in same region, the same economic/financial environment (public or private), producing the same output / product etc...to remain consistent with the existing basic tools and procedures.

Sincerely

Dialo Umkele