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26 January 2012

**Subject: Response to the call for public input on the draft Guidelines for data quality in the establishment of standardized baselines**

Dear Members of the Executive Board of the Clean Development Mechanism,

I appreciate the extended deadline for submitting public inputs on the “draft Guidelines for data quality in the establishment of standardized baselines.”

Generally, the Guidelines are a welcome guidance document to facilitate the development and maintenance of standardized baselines by providing a framework for collecting and processing input data.

Specifically:

Paragraph 11(e): “Currency” could be replaced by “currentness” for clarity. The two words are synonyms, but the former is also the word used to describe a medium of monetary exchange.

Paragraph 11(g) states there should be “no room for assumptions” in compiling data. It may be more appropriate to provide some degree of flexibility, but requiring that any assumptions be made explicit and only conservative assumptions to be made.

Paragraph 16: Rather than requiring all installations to contribute, since it seems inevitable that some installations will not comply, the DNA could establish and justify a minimum threshold for participation based on domestic sector characteristics.

Data templates: Will the sector-specific data templates developed by the Secretariat be submitted to calls for public input? The data templates must be flexible enough to allow for e.g. different frequency, units and methods of data collection from different facilities.

Finally, DNAs thus far have not been involved in the collection and management of activity and emissions data, nor have they been responsible for this type of activity. The only obvious exception is DNAs that voluntarily chose to develop national grid emission factors; however, in this case oftentimes the process of collection and management of data has been outsourced. For this reason, there may be difficulties for DNAs to follow this guidance given that the type of work involved is outside the scope of their usual activities. On the one hand, it should be clear that the guidelines also apply to the entity to which work is outsourced, when that is the case. On the other hand, perhaps the Secretariat could offer technical support to DNAs (especially e.g. those with fewer than 10 registered CDM project activities as of 31 December 2010) for capacity building in applying these Guidelines.

Thank you for considering these inputs.

Sincerely,

Jessica Wade-Murphy de Jimenez