

UNFCCC Secretariat  
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Germany

January 20, 2012

**Subject: Inputs on the “Draft Guidelines for Quality Assurance and Quality Control of Data used in the Establishment of Standardized Baselines” in response to the call for public inputs made at EB65**

Dear Members of the Executive Board and UNFCCC Secretariat,

We welcome the opportunity to provide inputs on the “Draft Guidelines for Quality Assurance and Quality Control of Data used in the Establishment of Standardized Baselines”. Whilst recognizing the importance of ensuring data quality and its accuracy, we are of the view that the guidelines as currently drafted cannot be implemented in practice as the requirements are too demanding and costly, in particular for LDCs due to lack of capacity. The ‘more-than-needed’ requirements are likely to deter the application of SBs at a time when experience with new standardized approaches is needed. QA/QC procedures and requirements should reflect practicality, acceptability, cost-effectiveness, existing experience and the potential for application at a broader level. Our recommendations on developing such guidelines are as follows:

- **Start with a bottom-up approach:** Considering that different DNAs may wish to facilitate development of standardized baselines for different activities/measures, allow DNAs to first identify their specific data requirements and design their own data templates and QA/QC procedures for the specific measures/activities they wish to propose SB approaches for. Under this, DNAs define what they want to do and what they need and then Secretariat can review, propose improvements and then develop "sector specific templates" for a broader application and usage.
- **Building on IPCC guidance on GHG inventories:** The guidelines need to be drafted in such a way that they maximize the quality of data used to establish SBs given the available resources that reflect cost effectiveness and timeliness. In this sense, we recommend that the guidelines build on the work of the IPCC in determining appropriate QA/QC for greenhouse gas inventories in the *IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories*.

- **Recognize use of already available data – both national and international:** Considering field difficulties with collection of facility/user specific data, the guidance document should recognize use of data sources that already exist and are used for other purposes, e.g. for the development of national greenhouse gas inventories and/or used in part of national communication reports. Also, allow using secondary data sources such as industry surveys, industry association reports, data collected by relevant national institutes/government agencies for different purpose in addition to international datasets that publish country specific data such as IEA, FAO.
- **Allow use of more default values.** As it is evident from experiences in different countries that data availability is difficult to ensure, it would be useful to propose default values for various common parameters that can be applied globally and to avoid data collection issues. The adoption of materiality standards in the application of this guidance would be useful as well.

We will be pleased to provide further information and clarifications at your request and would welcome the opportunity to further contribute to the development of procedures for the establishment of standardized baselines.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Klaus Oppermann', followed by a long horizontal line extending to the right.

Klaus Oppermann

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