

Head and Members of the CDM Executive Board
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Your reference	Your letter of	Our reference	Extension	Date
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Subject: Call for public input on sampling standard

Dear Mr. Hession,

Germanischer Lloyd Certification GmbH (GLC) takes the opportunity to thank the CDM Executive Board's numerous efforts on continuously improving CDM related procedures and requirements, and would like to contribute to this public call for inputs on Sampling Standard with regards to the following topics:

1. Editorial Issues

- a. Footnote 10 needs clarification on directly derive variance when the parameter of interest is a proportion or a percentage, since the standard deviation for the proportion value needs as well pilot studies, unless e.g., the expected precision 10% is taken as the "expected variance" for such parameters, but justification shall be given when it is applicable.
- b. Paragraph 13, the word "though" in the 2nd line should be "through".
- c. Footnote 11 shall delete "the range of confidence".

2. Cost-effectiveness

Paragraph 21 specifies that "DOEs shall draw a sample from the project sample selected by project proponents ..." which is deemed as a random compliance check; however, the sample units required with min. 25 and max. 50 have not considered the practical situation and cost-effectiveness of projects/PoAs that are located in different regions, or even spread over the whole country/ several countries. E.g., as per the draft standard, a cook stove PoA in several African countries may require random sample of 25-50 stoves for DOE to check in 25-50 locations across African continent.

3. Requirements on DOEs

- a. Section V specifies requirements for DOEs to assess sampling plans. It is requested to clarify when values derived from DOE's samples differ from values from project participant's, which value shall be applied for emission reduction calculation, especially when DOE's values are more conservative.

- b. Footnote 16 clarifies that "...not necessarily listing specific names, qualification and experience"; however, such information needs to be checked either during validation for baseline survey or verification for monitoring, which has not been indicated by the standard.
- c. Appendix 5 has provided "recommended evaluation criteria for DOE Validation", though it has also indicated "... criteria should be utilized by DOEs..." It is requested to clarify to what extent DOEs should validate all the criteria, and when terms such as "Objectives and Reliability Requirements" not defined by the standard itself, what references shall be used.

4. References and Formulae

It is commended that references from the previous version of the sampling guidelines to be kept and sampling size calculation formulae can be included for best practice examples.

Should you need further clarifications on the above comments, please kindly contact Mrs. Jun Wang (jun.wang2@gl-group.com) or Mr. Markus Weber (markus.weber@gl-group.com).

Yours faithfully,



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