

October 17, 2011

CDM Executive Board  
c/o UNFCCC Secretariat  
P.O. Box 260124  
D-53153 Bonn  
Germany

**Subject: Response to the EB call for public inputs at its 63<sup>rd</sup> meeting regarding standard for sampling and survey for CDM project activities and programme of activities.**

Honorable Members of the CDM Executive Board,

We welcome the opportunity to provide inputs to the draft standard for sampling and survey for CDM project activities and programme of activities. The suggestions are outlined below.

**Paragraphs 20-23 on sampling requirements for PoAs**

The categorization of PoA into homogenous PoA or non-homogenous is not part of the definition of a PoA. Such a categorization has a risk of introducing subjectivity into the categorization of PoA and could lead to different interpretations among project proponents and DOEs in application sampling guidelines to a PoA. Therefore, it is suggested to include – alternative paragraph for 20-23 - under sampling requirements for PoAs in the standard for sampling and survey.

In paragraph 23, for common sampling plan for the PoA or for a group of CPAs, the standard includes a confidence/precision of 95/10 and 95/5. It is suggested to include only the confidence/precision of 95/10 so as to avoid potential differences in the confidence/precision specifications of methodologies and the sampling standard. This also ensures consistency in confidence/precision outlined in the sampling standard for large scale projects and programs. Therefore, it is suggested to exclude the confidence of 95/5 in paragraph 23.

**Paragraphs 23-27 on sampling requirements for DOEs**

In paragraph 26, the guidance states that if there are fewer than 25 units in the project sample, then the DOE shall check all of them. This is expected to be costly and cumbersome especially for small scale project activities that are geographically dispersed over a wide region within a country. It is suggested that the minimum number of units to be checked by DOE in such situations should be limited to half of

those fewer than 25 units, with the minimum of 10 units to be checked so as to lower the validation/verification burden on PP and DOEs.

The guidance in paragraph 27 is likely to undermine the guidance provided in paragraph 26 as the sampling thresholds approved by EB in paragraph 26 may be considered inadequate by a DOE, which could translate into elaborate and costly sampling procedures by a DOE potentially leading to additional validation/verification costs to PP. Therefore, it is suggested to exclude the paragraph 27 from sampling requirements for DOEs and adopt the sampling requirements proposed for DOEs under paragraph 26 as adequate for all projects under CDM

We request the EB to approve sampling standard that balances the level of uncertainty targeted under CDM while remaining cost effective for projects and programs implemented in least developed country contexts.

We will be glad to provide any further information and clarifications as necessary.

With kind regards,



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