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Subject **Call for public input on the draft best practices examples**

Honorable Members of the CDM Executive Board,

This input has been prepared by the Designated Operational Entities and Independent Entities Association (D.I.A.) after inviting all members to provide feedback. The following delivers comments to the document in general, while no specific reference to individual paragraphs or section is given.

Use of document:

D.I.A. acknowledges that the CDM EB previously has adopted a “document hierarchy & types”, and based on this “hierarchy & types” it is unclear to us how this document would fit. As the document essentially is providing a lesson in statistics and therefore does not fully fit within the “Guidance” and/or “Clarification” section of the Document “hierarchy & types”. In the current format it is neither linked to a specific procedure and/or standard. One could argue that this provides guidance on the methodological requirements of sampling, however the document only outlines how to determine the sample size, and perform reliability calculations. It does not give any information on how the CDM EB is expecting that the findings of the sample are applied in the methodology, particularly when the sample does not meet the requirements for sampling (90/10) (see for details below). As such it is suggested that this is not made available as part of the current CDM document “hierarchy & types” but only as a reference document. If used as a reference document it might however be more prudent that the CDM EB provides an Excel file that contains the different calculation modules/formulae used to determine sample size and reliability calculations, particularly if the current explanations were included within the same Excel file.

Missing elements:

D.I.A. finds that although the examples are useful in understanding the calculations of sample size and performing reliability calculations and D.I.A. recognizes the provisions under par 4 of the document. Nevertheless D.I.A. feels that in order for this document to be useful, the document is missing a crucial element. Due to the fact that the document limits itself to only determining the initial size of the sample and initial assessment on the reliability calculations it lacks any instructions or guidance on what the project proponent is expected to do with the

findings from the sample. For example:

- where the sample is not within the precision levels, would the Project Proponent then have to expand the sample , would it have to take a whole new sample or simply re-stratify the sample?
- par 196 current could lead to confusion among the PP and the DOE. Although its principle explained in this par is correct, the text could be lead confusion. The document should make clear remind that in line with the CDM Requirements outlined in the “Standard for sampling and surveys for CDM project Activities and Programme of Activities” par 16 that unless the methodology specifically specifies the calculated average of the sample is to be used and not the lower or upper limit;

Whilst staying within the provisions of par 4 of the document D.I.A. would have expected that more guidance would have been provided on how populations are delimited to form the same plan. Currently a number of examples provide some examples of structuring uniform groups within the overall populations. However, there is little text within the document that talks about stratification of the sample population or variations within the project boundaries.

#### Objective of the Document:

D.I.A. welcomes the initiative of the Board to provide guidance on sampling to both the project developers and the DOEs. However, in order to be effective this guidance should be aligned with the ultimate objective of sampling, which is to determine with a reasonable level of confidence the right value of a particular parameter which is used within the calculations of the applicable methodology using sampling. Whereby, on the one hand, the Guidance should provide project proponents with clear guidance on:

- how the right sampling size is determined; and
- how the results are used in the methodology;

it should at the same time provide the DOEs guidance on:

- how to examine that the applied sampling is correct;
- how it should test the sample data for correctness;
- what the consequence are when the DOE finds that the sample data is not correct.

The CDM EB has already made valuable advances in this direction in some of its other guidance, however we feel that in line with the current “Documents hierarchy & types” the current document should be revised to include the above points prior to adopting it as a Guidance document.

We look forward to further contributing on this matter.

Kind regards,



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