

August 07, 2012

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

**Subject: Call for Inputs on “Standard for sampling and surveys for CDM project activities and programme of activities” and “Best practice examples focusing on sample size and reliability calculations and sampling for validation/verification”.**

Honorable Members of the CDM Executive Board,

We welcome the opportunity to contribute inputs on the documents “Standard for sampling and surveys for CDM project activities and programme of activities” and “Best practice examples focusing on sample size and reliability calculations and sampling for validation/verification”. The inputs on the draft guidelines are noted below.

**Minimum sample size:** The minimum sample size specified in paragraph 11 is reasonable.

**Uniform guidelines on sampling for large scale methodologies and small scale methodologies:**

The standard for sampling and surveys for CDM project activities and programme of activities approved at the 65<sup>th</sup> meeting of CDM Executive Board is applicable to both large methodologies and small scale methodologies. However, as per the footnote 14 in paragraph 19 of the standard, large scale methodologies are not covered under the guidelines for applying a single sampling plan covering a group of CPAs in a PoA. As CPAs are included in a PoA based on the compliance of criteria of a PoA and requirements of relevant methodology, a single sampling plan should be applicable to the group of CPAs of a PoA without the limitations on small scale methodology or large scale methodology. Therefore, it is suggested to remove the restriction noted in footnote 14 on applying single sampling plan in PoAs using large scale methodologies.

**Clarification on the application of the results of single sampling plan to newly included CPAs:**

It is relevant to clarify in the paragraph 19 of the standard on sampling and surveys on the application of the results of single sampling plan adopted for a group of CPAs to the newly included CPAs in PoAs implemented using methodologies (e.g. AMS .I.L; AMS.II.J; and AMS III.BB) that require surveys to be conducted at specific intervals. Clarification is required on the application of sampling guidelines to the new CPAs that are included in a PoA between survey intervals of crediting period.

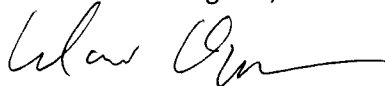
**Elaboration of best practice examples:** The best practice examples are useful in providing practical guidance on the calculation of the sample size under sampling schemes applicable to different project types. However, there is significant duplication in the examples presented in the document under small scale and large scale project categories. It will be also useful to focus the examples on the sampling schemes rather than on the project size, i.e. small scale projects

vs. large scale projects. Adopting a flow chart to outline the choice of sampling schemes and presenting examples under each scheme will avoid duplication in the examples for small scale and large scale projects.

**In the document on best practice examples, section III on reliability calculations and section IV on failure to achieve reliability can be included as part of the numerical examples:** Checking and conforming to the precision, confidence and reliability and steps to be implemented for failure to achieve reliability are part of the application of sampling schemes. Therefore, it will be useful to integrate the information in section III on reliability calculations; and section IV on the steps to deal with for failure to achieve reliability under the respective examples without the need for standalone section III and section IV.

**Section V on acceptance sampling in the best practice examples document requires further improvement:** The consistency between section V (validation and verification of sampling plans of project activities and PoAs) of the standard for sampling and survey; and section V on the acceptance sampling in the document on best practice examples needs to be ensured. In this context, clarification on the application of the paragraph 22 of the standard on sampling and survey on how the acceptance sampling is implemented for the situations when project proponents have not applied a sampling approach will be relevant. It will be useful to elaborate the section V of the best practice examples document on acceptance sampling with reference to the paragraphs 22 to 26 of the section V of the standard on sampling and surveys to make guidance easily accessible to project proponents and DOEs.

With kind regards,



Klaus Oppermann

Team Leader, Policy and Methodology  
Carbon Finance Unit, World Bank