



Submission

To: CDM Executive Board
From: Aretech Climate Change
Subject: Call for inputs on draft general guidelines on sampling and surveys
Date: 1 July 2009

Dear Members of the Executive Board

Aretech Climate Change appreciates this opportunity to comment on the draft general guidelines on sampling and surveys for CDM project activities.

Small-scale

Although the document was prepared by the SSC WG and discussed by the Board under agenda sub-item 3(d), the wording "small-scale" never appears in the draft guidelines. Our comments below are intended to apply only to small-scale projects.

Widespread possibilities

Point 9 of the draft guidelines offers widespread possibilities for sampling and surveys:

Moreover, project implementers may propose to obtain estimates of other variables using sampling techniques if that is the only practical or cost effective means to obtain them. For example, several methodologies require that estimates for key variables be obtained through "monitoring", without specifying the extent of such monitoring.

Furthermore, the draft guidelines suggest 90/10 precision as a default level for important variables to be monitored. We welcome the inclusion of cost-effectiveness as a criterion for monitoring key variables in small-scale projects, as well as the certainty from publishing a default precision level. In order to achieve the widest usage of sampling techniques, we request the Board to consider the following:

Proponents of small-scale CDM projects may propose sampling techniques for monitoring any variable if that is more cost effective or practical than continuous monitoring, as long as default precision levels can be validated by the DOE, without the need for a request for deviation.

Deviations from Registered Monitoring Plans

In addition to the use of sampling in newly proposed PDDs, we request the Board to consider authorizing the use of historic data from registered small-scale projects to achieve more cost-effective results in future monitoring periods, within the specified precision levels. Since the precision levels would be pre-established, the integrity of emission reductions is assured.



We believe that default precision levels and verifiable statistical analysis are key to putting in place the guiding principle for small-scale monitoring (point 9(d) of Annex II to Decision 4/CMP.1):

Monitoring plans are simplified, including simplified monitoring requirements, to reduce monitoring costs;

For example, a registered project that continuously monitors the weight of biomass residues or wastes handled by some 20 to 25 carts per day, after two years, has developed over 15,000 data points on the whole population, not just a sample. This data set on the whole population could be used to demonstrate the trustworthiness of alternate monitoring techniques:

Stratified population and sampling. If the data on the entire population could be classified into individual strata, each with relative deviation less than 6% of its mean value, the 90/10 precision limit would be met. Future monitoring could be simplified, by counting units in each stratum along with random sampling within each grouping.

Precision of alternate monitoring procedures. A large data set of the population, 15,000 in this example, would be able to quantify the precision of an alternate monitoring procedure, such as a calculation scheme based on overall process mass or volume balances.

In both of these examples, statistics from the whole population, not just a sample, would assure the precision and verifiability of more cost effective monitoring solutions for small-scale projects. Therefore, we request the Board to consider an enhanced scope for these guidelines, so that they could apply not only to new small-scale project activities, but also to existing small-scale projects within their present crediting period. Perhaps this would imply modifying the procedure for requests for deviations, only for small-scale projects:

Small-scale CDM projects will be granted deviations from monitoring plans in registered projects for future monitoring periods within the present crediting period if it can be demonstrated and verified by the DOE that the proposed deviations achieve the default precision level based on the statistical analysis of the population of measurements from earlier monitoring periods.