

 <p><b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b></p> <p>This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organization):	Atmosfair gGmbH Xaver Kitzinger
Address and contact details of the individual submitting this form:	Address: Zossener Str 55-58 Telephone number: +49-6273550-25 E-mail address: Kitzinger@atmosfair.de
Title/Subject (give a short title or specify the subject of your submission)	Monitoring and verification activities in countries with security issues
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
Specify whether you want the letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below <sup>3</sup> to describe the purpose of this submission.	
<input checked="" type="checkbox"/> <b>Type I:</b> <input type="checkbox"/> <b>Request for clarification</b> <input type="checkbox"/> <b>Revision of existing rules</b> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input checked="" type="checkbox"/> Guidance. Please specify reference CDM-EB67-A06-GUID <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference  <input type="checkbox"/> <b>Type II: Request for Introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

<sup>1</sup> DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

<sup>2</sup> As per the applicable modalities and procedures, the Board may make its response publicly available.

<sup>3</sup> Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

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Dear honorable EB members,

We would like to ask for urgent clarification and guidance for the on site verification visit of our cook stove PoA in Nigeria (ID: 5067) due to take place in June 2014.

We would also like to highlight that situations like the one faced in Nigeria may be applicable for various CDM projects and programmes. We therefore also hope that a long term solution can be found.

Security situation in Nigeria:

Rural households in Nigeria heavily depend on firewood for daily energy needs (mainly cooking). At the same time, especially the north has huge problems with desertification and deforestation. During the last years, the same region has faced more and more violent conflicts between ethnic groups, internal migration and attacks by terror groups (see for example <http://www.washingtontimes.com/news/2014/mar/2/spread-of-brutal-nigerian-terrorist-group-alarms-u/?page=all> ). Recently, the Nigerian President declared a State of Emergency in Borno, Yobe and Adamawa.

The UK government is giving the following travel advice <sup>(4)</sup>:



<sup>4</sup> <https://www.gov.uk/foreign-travel-advice/nigeria>  
Version 01.2/ 8 February 2012

Background of the cookstove PoA in Nigeria:

The PoA [Improved Cooking Stoves for Nigeria Programme of Activities](#) ID: 5067 is registered since November 2011 and was the first PoA in Africa which has received issuance of CERs. Since 2011 the security situation in Nigeria has deteriorated continuously. The security situation in Nigeria has already resulted in huge delays for conducting the monitoring for the second monitoring period and was connected with immense risk for the personal involved in conducting the user interviews. Now that finally all the required interviews and efficiency tests of about 100 users throughout Nigeria have been completed we want to plan for the verification on site visit due to take place in June before the Ramadan begins.

Current CDM Requirements for on site verifications and implied problems:

The DOE needs to apply the concept of acceptance sampling during the on site verification site visit. This means that a sub sample of the monitoring sample needs to be visited and the results of the monitoring campaign are verified. There are only 1 – 2 discrepancies allowed (depending on the sample size).

According to CDM-EB67-A06-GUID (Guideline: Sampling and surveys for CDM project activities and programmes of activities) the absolute minimum sample size of the acceptance sample is 22 with only one discrepancy allowed.

According to the distribution of our monitoring sample for the ongoing monitoring period we doubt that we will be able to visit 22 households for each sub sample since: For the PoA about 94% of the sampled households were located in states, which are colored in orange (56%) or red (38%) on the map above. This leaves only the number of 7 sampled households in the safer (green) areas. This shows there was great interest to purchase the stoves in times when the region was still safe (and there probably still is)

In addition it is likely that during the verification site visit, some households or regions can not be visited due to local security issues which develop on a short notice, or that households are not willing to let any strangers into their houses due to fear of attacks.

If no exemption of the strict sampling rules can be found we fear that no DOE will accept to do the site visit or that during the site visit we will not be able to reach the appropriate sample sizes to fulfill the requirements of acceptance sampling. If no CERs can be issued during this monitoring period we would need to stop the distribution of any further stoves since the stoves are heavily subsidized by carbon finance.

Proposed solution for the verification due in June 2014:

While we do not hold a silver bullet for this problem we hope the CDM rules allow for enough flexibility to deal with this difficult situation. The Gold Standard Foundation has already tried to address this problem; however their solution to send local people (objective observers) into conflict zones to do the verification on behalf of DOEs may also be questionable (see [http://www.goldstandard.org/wp-content/uploads/2012/05/v2.2\\_ANNEX-X.pdf](http://www.goldstandard.org/wp-content/uploads/2012/05/v2.2_ANNEX-X.pdf))

We propose to give the DOE more flexibility on how to conduct the site visit and deviate from the acceptance sampling method. We propose that the DOE selects a monitoring sample of its own which includes as many households as possible from the monitoring sample which are located in safe areas e.g by applying simple random sampling but excluding areas which are not possible to be visited.

. For areas which are not safe for visiting, the DOE should be allowed to try phone interviews for cross check of monitoring results (however in some of the red regions, phone networks have been destroyed).

We also propose that the requirements for sampling quality of the DOE sample is reduced to e.g. 85/15 instead of 90/10 precision requirements in order to reduce the sample size required.

We hope for the understanding of the EB and hope to receive a response as soon as possible so that we can proceed with the planning of the site visit. . If no CERs can be issued during this monitoring period we would need to stop the distribution of any further stoves since the stoves are heavily subsidized by carbon finance. Stopping the stove distribution would penalize the people of northern Nigeria which are already most affected by the tensions. It should also be noted that efficient cook stoves make a valid contribution to lowering tensions in Nigeria, by reducing the competition over scarce firewood and mitigating desertification caused by deforestation and climate change.

General validity of the request for decentralized projects or PoAs in countries with security issues:

Not only third party verifications are very problematic under circumstances where it is dangerous to do household visits but also the annual monitoring.

During the annual monitoring a team needs to visit a random sample of households to do interviews and efficiency tests. Since the monitoring team needs to be trained staff it cannot be ensured that the personal doing the interview in the households are from the same community, so that in many cases the team has to travel long distances over insecure land. In other cases the sampled households might be located directly within insecure areas. We already experienced occasions where monitoring of sampled households resulted in immense risks for the life and health of monitoring staff. In order to ensure the safety of the monitoring team insecure areas cannot be visited and sampled households have to be counted as none users of the technology even though they were probably happy users. This causes a massive reduction of CERs and results in long delays and high costs for the monitoring.

The distribution and sales of e.g. efficient stoves is not that problematic because it doesn't require to visit individual households at their homes and temporarily insecure areas can easily be avoided.

We would like to suggest the development of general solution for such situations, and we would be glad to contribute to this process, in order to support the fair regional distribution of CDM projects and implementing CDM projects for the benefit of those who need the projects most.

<i>Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).</i>	
>> See above	
<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none"> <li>[replace this bracket with text, the field will expand automatically with size of text]</li> </ul>
<b>Section below to be filled in by UNFCCC secretariat</b>	
Date when the form was received at UNFCCC secretariat	24 April 2014
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**History of document**

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		