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<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Monitoring and verification activities in countries with security issues
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<i>Specify whether you want the letter to be treated as confidential²:</i>	<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 ³ to describe the purpose of this submission.	
<input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules </div> <ul style="list-style-type: none"> <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"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

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

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

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

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Dear honorable EB members,

On 24th April 2014 we sent you a letter on “Monitoring and verification activities in countries with security issues” regarding our cook stove PoA in Nigeria (ID: 5067) and received an answer on the 4th June 2014 for which we would like to thank you (INQ-01832).

Since the situation in Nigeria remains unchanged we would like to ask for further clarification for the on site verification for atmosfair’s second cook stove project in Nigeria (registered small scale project with the ID: 2711).

The same security conditions apply for the SSC Project as for the PoA and we would like to ask for confirmation that the exemptions granted by the EB for the Nigeria cookstove PoA in your answer from 4th June 2014 (INQ-01832), are also applicable for the SSC Project ID2711.

We further would like to bring to your attention that the verifying DOE (TUEV-R) also submitted a letter to the EB regarding the on site verification requirements for the small scale project and the PoA. We hope that their suggestions for doing the on site visit with local experts only will be accepted since otherwise we again we are not able to proceed with the verification.

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.

Summary and request for clarification:

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 (⁴):



<https://www.gov.uk/foreign-travel-advice/nigeria>

Background of the SSC cookstove project in Nigeria:

The Small Scale Project [Efficient Fuel Wood Stoves for Nigeria](#), ID: 2711 is registered since October 2009 and was the first registered CDM cookstove project under CDM and the first cook stove project to receive issuance of CERs. Since 2011 the security situation in Nigeria has deteriorated continuously. The security situation in Nigeria has already resulted in huge delays in the monitoring for the second monitoring period and was connected with immense risk for the personal conducting the user interviews. Now finally all the required interviews and efficiency tests of 100 users throughout the Guinea Savannah Zone of Nigeria (Central Nigeria) have been completed. The original plan to conduct the verification on site visit in June before the start of Ramadan had to be suspended due to the concerns of the DOE to travel to Nigeria. This concern arose from the fact that our project partner and the majority of the project households are located in the area coloured in orange on the map above.

Current CDM Requirements for on site verifications and implied problems:

The DOE plans 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 SSC Project about 64% of the sampled households were located in areas, which are colored in orange on the map above.

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 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.

We therefore ask for confirmation that the exceptions granted for our PoA are also applicable for the small scale project:

Granted exceptions for the verification sampling by the EB in its letter from 4th June 2014:

The Board noted that, “*Sampling and surveys for CDM project activities and programmes of activities*”¹, paragraph 29 (b) allows flexibility in the application of sampling standard under specific situations including security conditions. The Board agreed that the DOE may, for a period of one year for the Programme of Activity (PoA) reference number 5067, choose either one of the two approaches in accordance with “*Table 1: Sample size and acceptance number based on AQL, UQL, and producer and consumer risk*”:

(a) Take sample size of 18, with acceptance number of 1 from the zone not affected by the conflict (green zone in the letter); or

(b) Take sample size of 8, with acceptance number of 0 covering the entire project region (red, orange and green zones in the letter).

The Board encouraged the DOE to use complementary measures (telephone calls, photographic evidence, etc.) to cross verify the results.

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We hope for the understanding of the EB and hope to receive a response after EB80 so that we can proceed with the planning of the site visit.

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.

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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).

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1. Confirmation that the exceptions granted for the PoA 5067 in the letter INQ-01832 are also applicable for the small scale project 2711 in Nigeria.
2. Positive consideration of the requests by the DOE in their letter to the EB.

If necessary, list attached files containing relevant information (if any)

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

8 July 2014

Reference number

2014-365-S, INQ-02057