



Stakeholder Communication Form
(Version 01.0)

This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.

The completed form and any supplemental documents shall be submitted electronically to cdm-info@unfccc.int, or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.

SECTION 1: COMMUNICATION HEADER

Please provide your contact information.

Title: Ms. **First Name:** Katrin **Last Name:** Mikolajewski

Name of Organization: atmosfair gGmbH **E-mail Address:** wolf@atmosfair.de

Postal Address: Zossener Str. 55-58, 10961 Berlin **Phone Number:** 4930627355016
Country: Germany *Include country code (e.g. +49-228-815-1999)*

Stakeholder Type: CDM Coordinating/Managing Entity (CME) If other:

Please indicate from whom you would like to get an answer.

This communication is addressed to¹: Chair of CDM Executive Board (normal track)

SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)

If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).

Project/PoA Ref. Number 5067 If applicable, CPA Ref. Number:
5-digit# format 01234 *8-digit# format 0123-4567*

Project Cycle Stage Issuance If other:

If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).

Host Country(ies) Nigeria

Project/PoA Title Improved Cooking Stoves for Nigeria Programme of Activities; and 2711: Efficient Fuel Wood Stoves for Nigeria

Technology Type Household/building energy efficienc If other:

SECTION 3: YOUR COMMUNICATION

Title/Subject
Maximum 250 characters Request for Clarification on Monitoring and Verification in conflict zones

Communication Text
Include background, details, and conclusion (unlimited length)

Dear honourable EB members,
We would like to thank you for the detailed considerations regarding the sampling and survey processes in the new version of the CDM Guideline for "Sampling and surveys for the CDM project activities and programmes of activities version 04.0" adopted during EB86.
On the basis of this new guideline we would like to ask for urgent clarification and guidance on the proposed contingency measure for the monitoring and verification of our cook stove projects in Nigeria (PoA ID: 5067 and SSC 2711).
We have received a very benevolent answer from EB side regarding our letter from 24th April 2014 titled "Monitoring and verification activities in countries with security issues". The answer was extremely helpful for the facilitation of the verification on site visit.

¹ In accordance with the "Procedure: Direct communication with stakeholders" (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

Unfortunately, the security situation in Nigeria has deteriorated in the last years. Therefore, we would like to ask for clarification on possible contingency measures for data collection during the monitoring process itself and the on-site verification for both atmosfair's cook stove projects in Nigeria. Together with a DOE we have tried to come up with a temporary contingency plan that might help to overcome the exceptional situation for a timespan of three years.

Summary of the request for clarification: The travelling through Nigeria imposes a high risk for the local monitoring team during survey and data collection and for the third party auditors during verification.

In this light, we would like to ask for guidance on an approach to reduce the risk occurring during the monitoring and verification of the project. We would like to make the following suggestions, to limit the above-mentioned risk:

- A) Use of a combination of methods for the survey and data collection during monitoring
- B) Chronological combination of monitoring and verification site visits

Both steps will reduce the number of persons involved in the monitoring and the time travelling through insecure land and crisis areas during monitoring and verification.

1. Current security situation in Nigeria:

During the last years, especially the northern region of Nigeria has faced violent conflicts between ethnic groups, internal migration and increasingly attacks by terror groups. As a result, the Nigerian Government announced the State of Emergency in the states Borno, Yobe and Adamawa in 2013. The status is still valid today.

The latest attack in Borno, which was reported in international media, only happened on Thursday 15th of October 2015 (<http://edition.cnn.com/2015/10/16/africa/nigeria-mosque-suicide-bombing/>).

Travel advices exist from several governments against any travel or only necessary travel to certain regions in Nigeria. Please find attached as supplemental document a map published by UK government showing the different states of Nigeria coloured according to their travel advice status and thus their implied safety risk.

The travel warnings of US Department of State and the German Federal Foreign office are similar to the UK Foreign and Commonwealth Office recommending against all but essential travel to the states marked in red and orange in the attached map states due to the risk of kidnappings, robberies, and other armed attacks (<http://www.travel.state.gov/content/passports/en/alertswarnings/nigeria-travel-warning.html> and <http://www.auswaertiges-amt.de/DE/Laenderinformationen/00-SiHi/NigeriaSicherheit.html>). The situation is highly unpredictable so that terrorist kidnaps and attacks could occur anywhere in Nigeria, according to the UK Foreign and Commonwealth Office.

The improvement of the situation is not likely in near future.

The gaps between North and South and poor and rich, which is one of the reasons for the situation, is still enormous. The terror group Boko Haram has widened its territory of action to the neighbouring states Cameroon, Niger and Chad and there are signs that they are searching the contact to other extremist terror groups worldwide. According to Robert Kappel and the German Institute of Global and Area Studies, "the situation is not likely to improve in the next years. Although any development is very hard to predict, the "dynamic development towards a democracy and economic development" is the least probable of five developments of the country (GIGA, https://www.giga-hamburg.de/en/system/files/publications/gf_afrika_1503.pdf).

Most of the victims of violence and terrorism in Nigeria are Nigerian people. Therefore, not only third party verifications are highly problematic under those circumstances, but also the regular annual monitoring conducted by local organisations.

2. Current CDM Requirements for survey and data collection during monitoring and on-site verifications

Monitoring:

According to the registered PDD of the SSC 2711 a minimum sample size of 100 is required, from which at least every fourth needs to be a personal household visit.

For the PoA the standard for sampling and surveys version 4.1 is valid (CDM-EB50-A30-STAN ver 4.1). According to the PDD, prior to every monitoring campaign the sample size is calculated based on the last years monitoring results. The sample size for the last Monitoring Period was 86; <https://cdm.unfccc.int/filestorage/2/1/P/21PGJU4Y69SCB7TDMNKR5AEHQWIF/~2648507.pdf?t=M1R8bnZoamI0fDCI1V274LcsbMbDRXszA5An>). All interviews have been carried out via household visits.

For this year's monitoring period, at least 175 household visits would be required for both projects. From our experience, that entails about 43 days of travelling for monitoring survey and data collection and another week for the verification on site visit. Based on the colour zonation used in

the attached UK travel advice map about 81% of the stoves in our SSC project (2711) and about 79% of the stoves in the PoA (5067) are located in red and orange zones. Since we are taking random samples from the whole stove population, the distribution of the monitoring sample will be similar.

Verification:

The DOEs generally applied the concept of acceptance sampling during the on-site verification after the PP has applied a sampling approach (CDM-EB50-A30-STAN, par 24).

According to the last year's exception (Reference: 2014-355-S, INQ-01832 and 2014-365-S, INQ-02057) the sample size for the acceptance sampling size was reduced to eight with no discrepancy, or acceptance sampling size of 18 with one discrepancy allowed.

3. Request for guidance on proposed contingency measures during the survey and data collection and verification

We refer to the par 60 of the CDM-EB86-A04 and ask for guidance on possible contingency measures for the execution of the monitoring and verification visits for both projects (ID: 2711 and 5067).

To reduce the safety risk we suggest the following contingency measure in two ways and valid for three years:

A) Use of a combination of methods for the survey and data collection during monitoring

It is necessary and indispensable to limit the security risk during collection of data during the monitoring for the PoA (ID: 5067) and SSC (ID: 2711) to an acceptable level. The site-visits should not exceed about 10 days, therefore we suggest to apply a combination of the preference methods mentioned in the updated Guidance (CDM-EB86-A04), e.g. telephone interviews and household visits. A proposal of which methods are most suitable and to what extent they shall be applied (e.g. share of HH site visits versus phone interviews) will be presented to the DOE by the CME and decided upon by the DOE depending of current safety situation.

With regard to the required efficiency tests of the stoves we suggest to perform the tests at a central, safe place. We propose to conduct 6 WBTs for the PoA (3 Water Boiling Tests per stove type as per WBT protocol) and 3 tests for the SSC.

To assure a conservative ER calculation and to prevent the monitoring and verification team from additional household visits and an extended stay in Nigeria, we suggest to use the lower bound of parameter values, in case the required precision is not achieved after the completion of the monitoring survey applying the sample size calculated according to EB50 Annex 30 STAN ver. 4.1, 4.1 EB 80 Annex 07 and AMS.II.G vers.03..

Although this temporary contingency measures foresee a streamlined monitoring of the projects, we do think that the integrity of the data collection is assured for the following reasons:

- For each project separately, the sample will be drawn as a random sample, to assure representativeness for the full stove population.
- By combining different survey and data collection methods we assure that there is no discrimination against certain people, e.g. people living in areas where no site visits are possible.
- ER in both projects can be considered to be conservative because not all of the possible ER are accounted for in the emission reduction calculations in the PDD. For example, the additional firewood savings by the use of a heat retaining cooking box sold with the stove ("Wonderbox") is not accounted for.

B) Combination of site visits for Monitoring and Verification purposes.

Following your encouragement of the DOE to use complementary measures to cross verify results (Reference: 2014-355-S, INQ-01832 and 2014-365-S, INQ-02057) and CDM-EB86-A04, we would like to ask for further guidance on possible contingency measures to limit dangerous trips within Nigeria.

We suggest to execute joint site visits by the monitoring and verification personnel, in order to perform on the one hand monitoring activities and on the other hand to collect evidence and establish reliable methods to cross check information for verification purposes (e.g. take photos, videos, exchange phone numbers, agree on alternative communication channels, etc.).

The proposed procedure is as follows: During the joint trip, monitoring tasks (phone calls and HH visits) and verification tasks will be performed by the monitoring team and the DOE. The DOE has the possibility to follow the data collection for the monitoring closely by attending phone calls and household visits. The efficiency tests at a central place are arranged in a way that allows the DOE to see how and which data is collected. In this way the DOE can verify the correctness of the values reported in the monitoring report by using their own notes and other collected evidence without a second travel to the conflict zone. During the joint trip the DOE might establish relationship with locally available contact persons that could help to revise information in case the

| | |
|---|--|
| | <p>available evidence to the DOE needs to be double checked.</p> <p>A temporary solution for 3 years would allow to plan monitoring and verification according to the current security situation and its prediction for the upcoming years, as shown under point one.</p> <p>We hope for the understanding of the EB and hope to receive a response as soon as possible to allow us to proceed with the planning of the monitoring and verification of the projects.</p> |
| <p>Supplemental Documents <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p> | <p>Map of the Foreign and Commonwealth Office (FCO) travel advice: https://www.gov.uk/foreign-travel-advice/nigeria</p> |
| <p>This communication may be made public</p> | <p>Yes</p> |

Document information

| <i>Version</i> | <i>Date</i> | <i>Description</i> |
|----------------|---------------|--|
| 01.0 | 02 March 2015 | <p>This form supersedes and replaces the following:</p> <ul style="list-style-type: none"> • F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2) • F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1) • CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1) |

Decision Class: Regulatory
Document Type: Form
Business Function: Governance
Keywords: communications



Nigeria: Travel Advice



Users should note that this map has been designed for briefing purposes only and it should not be used for determining the precise location of places or features. This map should not be considered an authority on the delimitation of international boundaries or on the spelling of place and feature names. Maps produced for KTD are not to be taken as necessarily representing the views of the UK government on boundaries or political status © Crown Copyright 2015