



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.

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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 5067: 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 Request for Renewal of Special Permission for Monitoring and Verification in Conflict Zones
Maximum 250 characters

Communication Text Dear honourable EB members,
Include background, details, and conclusion (unlimited length) our certificate about contingency measures for monitoring and verification in conflict zones in our cook stove projects in Nigeria (PoA ID: 5067 and SSC 2711) expired on November 26, 2018. During the three years of the special permission, the proposed contingency measures have been applied and have guaranteed us secure and accurate monitoring surveys and auditors on-site visits.

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.

Both suggested contingency measures have been applied:

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

These measures have reduced the number of persons involved in the monitoring to 3 and the time travelling through insecure land and crisis areas during monitoring and verification to 10 days.

As the security situation in Nigeria has worsened over the last years, we are now seeking for a renewal of the permission of the contingency measures for another three years to face the violent conflicts in our project area.

1. Current security situation in Nigeria:

The security situation in Nigeria has deteriorated over the last year. Especially the northern region of Nigeria has faced violent conflicts between ethnic groups, internal migration and increasing 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.

Since the beginning of 2018, there have been 1394 deaths in Borno which are related to attacks of Boko Haram (<https://www.cfr.org/nigeria/nigeria-security-tracker/p29483>). Travel advices exist from several governments against any travel to certain regions in Nigeria. Please find attached as a 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 (<https://travel.state.gov/content/travel/en/international-travel/International-Travel-Country-Information-Pages/Nigeria.html> and <http://www.auswaertiges-amt.de/DE/Laenderinformationen/00-SiHi/NigeriaSicherheit.html>).

The German Federal Foreign Office disadvice from travelling to the states of Borno, Yobe, Adamawa, Bauchi and Gombe. Furthermore they disadvice from travelling all other northern states of Nigeria, to Kaduna, Plateau, Nassarawa, Benue, Delta, Bayelsa, Rivers, Imo, Abia, Anambra, Ebonyi, Edo, Enugu, Delta, Kogi, the southern part of Cross Rivers, Ogun and Akwa Ibom. This is not only valid for rural areas, but also for many of the cities within those states.

The situation is highly unpredictable so that terrorist kidnaps and attacks could occur anywhere in Nigeria, according to the UK Foreign and Commonwealth Office. Most of the victims of violence and terrorism in Nigeria are Nigerian people, but also foreigners have increasingly been affected by crimes. Therefore, both third party verifications and regular annual monitoring by local organisations are highly problematic.

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

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

According to the registered PDD of the SSC-project 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 5067 the standard for sampling and surveys version 4.1 is valid (CDM-EB50-A30-STAN ver 4.1). According to the PoADD, the monitoring sample size is calculated based on the number of distributed stoves. The sample size for the last Monitoring Period before our now ending three-years special permission was 86. All interviews had been carried out via household visits.

For this year's monitoring period, at least 180 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).

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 ask to renew the following contingency measures 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 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, save 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. Furthermore we recommend to have a separate sampling list for the WBTs, which will be drawn by random sampling based on the stoves sold in Kaduna within the stove data base.

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.

The applied contingency measures assure the integrity of the data collection 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 were 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

We suggest to continue executing joint site visits by the monitoring and verification personal, in order to perform monitoring activities on the one hand and to collect evidence and establish reliable methods to cross check information for verification purposes on the other hand (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) by the monitoring team and verification tasks by the DOE will be performed simultaneously.

	<p>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 may establish relationships with locally available contact persons that can help to revise information in case the available evidence to the DOE needs to be double checked.</p> <p>A temporary extension of the certificate about contingency measures for 3 more 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 If applicable, list the title(s) of any attached file(s) or link(s)</p>	<p>Map of the Foreign and Commonwealth Office (FCO) travel advice: https://www.gov.uk/foreign-travel-advice/nigeria</p> <p>https://www.cfr.org/nigeria/nigeria-security-tracker/p29483</p> <p>(https://travel.state.gov/content/travel/en/international-travel/International-Travel-Country-Information-Pages/Nigeria.html and http://www.auswaertiges-amt.de/DE/Laenderinformationen/00-SiHi/NigeriaSicherheit.html)</p>
<p>This communication may be made public</p>	<p>Yes</p>

Document information

Version	Date	Description
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)

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